**WorkforceGPS**

**Transcript of Webinar**

**WIOA Youth Performance Accountability**

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JENNIFER JACOBS: So again, we want to welcome you to today's WIOA youth performance accountability webinar, and if you haven't already done so, please introduce yourself in that chat window.

Now, without further ado, I'd like to turn things over to our moderator today, Sara Hastings, unit chief, the Division of Youth Services at the Department of Labor, Employment and Training Administration. Sara?

SARA HASTINGS: Thanks, Jenn, and hey, everyone. Happy afternoon for many of you, and still we've got morning for folks on the West Coast. Welcome, welcome, welcome. We're so glad you are joining us on this performance accountability for the WIOA youth program webinar.

This is our fourth and final webinar of our four-part webinar series that has kicked off our journey together TA series, and hopefully, many of you have been on the other webinars, one earlier today on youth committees and yesterday we had one kicking off the session and of course the webinar yesterday on eligibility. We today – and you can go to the next slide, please.

Today we have about 1900 people that have registered for this webinar, and we are just so excited that people are interested and wanting to continue to learn with the field, with your peers, learn about the performance accountability. Again, I think this is one of the things where, as a field, we're sort of still learning what are the performance measures, how does it impact our program model, how do we think about serving young people, keeping in mind some of these performance measures, and learning really together. So we're glad that you've joined.

Again, I think there's probably a lot of folks that have a really good sense of performance accountability. You may have heard previous webinars and presentations on this. You may have been at some of the national convenings that we hosted. So this may be a review for a lot of folks, and if it is, that's great. We'll get a refresher. For those of you that haven't been a part of some of those previous webinars, hopefully you get a lot out of today.

Here, again, on this slide you can see that we just have – we are on number four for our TA webinar series that's kicking off our TA series. And as we talked about before, we're really hoping to do a lot of different kinds of TA through a lot of different delivery mechanisms. So in addition to webinars, we may provide some fact sheets, case studies, myth busters, and more.

We got so much good feedback from you all on our first webinar yesterday morning about what you guys think would be really the most helpful to receive TA on. And we're so happy to have gotten that information, and we will be incorporating all of your ideas and thoughts into our TA plans moving forward.

So for those of you who missed these webinars, earlier webinars, no fear. We of course have recorded those, and you can get those within two business days, I believe. We're at two business days. So you can check back in maybe next week. Early next week you'll be able to have access to all of these recordings of the webinars. So without further ado, I'm going to pass this over to Evan Rosenberg who will get our conversation going on performance accountability. So, Evan?

EVAN ROSENBERG: All right. Thanks, Sara, and welcome, everybody. Glad that folks who were on yesterday joined us again today. If those of you who weren't on yesterday are joining us for the first time, glad you could make it. We are going to talk about performance accountability today.

I'm Evan Rosenberg from the U.S. Department of Labor. I work with Sara in the Division of Youth Services, and joining me will be Cesar Acevedo. He also works with us at the U.S. Department of Labor's national office, and he works in our Office of Policy Development and Research. And you'll be hearing from Cesar later.

So now, I'll talk a little bit about today's objectives. What we're hoping to do today is to provide you all state and local practitioners and youth service providers with what you need to know about performance accountability. Often people who are working directly with young people in terms of service provision believe that maybe performance accountability isn't a topic they need to know the gory details of and the ins and outs of, and oftentimes, it's left to those folks who specialize in performance and management information systems.

And for the really specific details, things like specifications, I agree with that sentiment. However, I think it's really important for all levels of youth service providers, whether we're talking at the state level, the local workforce board level, or the service provider level, to really understand some of the key components of our performance system, things like the definition of participant and exit, our primary indicators of performance, and even the statistical adjustment model that we now have under WIOA and our negotiations process.

Now, you don't need to know all the details, but I'm going to cover some key things today that I believe it's important for you to know in the context of youth. We always want you to keep the youth in mind first and provide the services necessary for their success, and we believe that, if you provide good services to youth, you will be successful in the performance accountability system. But even so, it's really important to know the details because they can impact the timing of things and lots of things related to your service delivery. So hopefully, you'll find this presentation useful to your work as a youth service provider.

If you were on yesterday, you know that I love to do quizzes. We had a whole bunch of them on our eligibility webinar, and with maybe one exception, the majority of our audience got most of the quiz questions right. So now, we are going to do one quiz question. Think of this as the pretest quiz question before I present the content to you, and let's see where we stand in terms of a pretty specific performance accountability question. So if you could put the poll up, and then I will read our quiz question for you.

So our question is, which of the following statements is true? "If an in-school youth becomes a participant on June 15th, 2017, they are included in the credential indicator in program year 2016." And I should say our program year runs from July 1, 2016 to June 30, 2017. Second choice, if an in-school youth becomes a participant on June 15, 2017, they're included in the measurable skill gain indicator for program year 2016. Third choice, a career readiness certificate counts as a positive outcome in the credential indicator. Or fourth choice, a youth in postsecondary education in the second quarter after exit who also works a part-time job six hours a week during the second quarter after exit is excluded from median earnings. So I'll give you a little while to digest that. I know it's a pretty complex question, and then I'll talk about the answer shortly.

All right. So I have a little bit of a delay in looking at the results on my end, but so far it looks like the second option is leading, which is an – if an in-school youth becomes a participant on June 15, 2017, they are included in the measurable skill gain indicator. That is the – that second option is the true statement. The other statements are false, and as I go through the webinar, you will learn why all of those other three are false and why that number two one is true. So by the end of the presentation hopefully you will know why the answer is the answer.

All right. So let's keep moving. We have a number of Training and Employment Guidance Letters that are relevant to performance. You don't have to know everything in these guidance letters, but they're a really good resource for you all if you're ever wondering about performance information and have questions. The most important one by far is Training and Employment Guidance Letter 10-16, and we actually recently published the Change 1 to that guidance in December of 2016.

So that's probably your go-to resource for everything performance-related. The act and the Final Rule are also obviously good resources for you, but that TEGL 10-16 Change 1 is probably the most important resource. And then there's also TEGL 26-16, which is the use of supplemental wage information guidance. That's something that probably won't apply too much to you in your service provision, but if you're ever wondering about how to enter wage information that's not wage records, the supplemental information, that's your resource for that.

We also have guidance letter 3-17, which is a short one that talks about the timing of the WIOA annual performance report submission for this most recent year, PY '16. And then lastly, we don't have – and I said this a number of times in our eligibility webinar yesterday – data validation guidance. We don't have that out yet for WIOA, but we are working on it. We hope to have it out by the end of the year.

It will be joint guidance with the Department of Education, just like our performance guidance 10-16 was joint guidance with the Department of Education, which is really great because it means we're giving the same guidance across Titles I, II, and IV. So when you're working with partner programs, there's the same reporting requirements, same performance measures, same guidance, which makes it much easier to partner across programs. So we hope to have that out by the end of 2017 or, if not, early in 2018.

All right. So let's get started with some of the key information to know. First and foremost, I think it's really important to understand our definition of a youth participant. So in our guidance the definition overall of a participant that applies to all of those core programs I just talked about. All the Title I programs, youth, adult, dislocated worker, Title II adult education, and Title IV vocational rehab, they all use this definition of a participant in the first bullet point, which is a reportable individual who receives services other than self-service or information-only services and has satisfied all applicable programmatic requirements including eligibility determination. Now, I know that's a mouthful and pretty technical, and you don't need to memorize that definition.

What you really need to know is the second bullet on this slide, which is what this means for youth, and we broke this down in that guidance letter 10-16 I referenced earlier. And so what it means for a youth participant is four things need to happen before they're an official youth participant. Number one, eligibility determination, and we spent a whole hour and a half yesterday talking about eligibility determination and we have lots of resources to help understand what eligibility determination is on our eligibility resource page.

Second thing that has to happen is the objective assessment. As hopefully you all know, that's a requirement in the act. The third thing is an individual service strategy, also a requirement in the act. And then lastly, the individual has to receive one of the 14 youth program elements, and the participation date where they become an official participant does not occur until all four of those things happen.

And we know they don't happen simultaneously, for the most part. So if someone is determined eligible and receives an assessment and never comes back again for services, that person never becomes a participant in the WIOA youth program. All four of these things have to happen for them to become a participant. So that is a real key piece of information for all youth practitioners to know.

Now that we've talked about what makes an individual a youth participant, the next concept I want to talk about is our concept of exit. This has been around under WIA, and we really didn't change a whole lot from WIA to WIOA. Pretty similar definition. So those who were around during WIA should be familiar with this definition, but what our definition of exit is is it occurs when the participant no longer receives services for 90 days and has no additional services scheduled.

And I want to point out that phrase no additional services scheduled because that's a real key phrase to keep in mind. It allows you, if you have some services scheduled that go beyond 90 days – let's say the young person wants to enter a training but that training course doesn't start for four months – you can keep them enrolled in the program and they don't exit just because that training program doesn't start for another four months.

But when 90 days of no service goes by and there are no additional services scheduled, then the individual exits, and that date of exit is the last – retroactive to that last date of service. So you won't know their date of exit until 90 days goes by with no service, and then at that point you'll know that their date of exit was that last date of service.

Now, we have a few services that don't delay an exit. Follow-up services are a good example, and the other two are self-service and information-only services. This was an issue that we saw a little bit in WIA where a young person was essentially done with the youth program but they might walk into a One-Stop career center and access some information-only services and every time they did that it would delay their exit and the young person wouldn't be exited for a lot longer than when they finished the youth program because of that.

So we did a fix to this in WIOA guidance, and now those types of self-service or information-only services like walking into a career One-Stop and maybe using the resource center, that would not delay exit.

Another concept related to exit that's important to know is the concept of common exit. It is encouraged but not required across Department of Labor programs. So each state would make a decision on this whether or not they're going to have common exit across their programs.

And what common exit means is that, for example, they might choose to have common exit across the adult and youth program so that, if someone was co-enrolled in the adult and youth program, they wouldn't exit from either of those programs until they are done with services in both programs and no longer receiving services for 90 days in both of those programs. That's what common exit is, and we don't have common exit across Department of Labor and Education programs.

So no common exit across Title I and II or Title I and IV, but within Title I a state can choose to have common exit. If you don't know if your state has common exit, you should check with your state workforce folks to find out.

Now, I want to talk a little bit more about exit and the concept of follow-up services because this is a question we often get, particularly for people who work on the adult and youth program because there is a pretty big difference in how we use follow up and how follow up relates to exit for the adult and youth program.

So what we said in our Final Rule is that there are five WIOA youth program elements that may be provided as a follow-up service, and this is a really good thing that gives you flexibility to provide some of the more support-type services to young people even after they exit the program without having to re-enroll them.

So if any of the following five services are provided after exit, they don't necessarily trigger new eligibility determination and they don't trigger new participation in the program and you have the ability to code them as follow-up services rather than a regular service that would then mean you would have to do eligibility all over again if they had already exited the program.

So those five services that I'm referring to are supportive services, mentoring, financial literacy services, services that provide labor market information, and postsecondary preparation activities. The reason we chose these five is these are the five services that we thought were most likely to occur after exit where young people would still need some support and help from the program, but they're not kind of the core services that are costly like occupational skills training or work experience.

For those types of services, if the individual has exited, then you would have to do an eligibility determination and re-enroll them as a new participant. But for these five services I talked about, they can be provided during follow up, and they don't trigger a new eligibility determination and new participation.

Just as a reminder, if you have any questions at all about some of the information I'm covering, please enter it into the chat, and then at the very end of the presentation we will try and get through as many questions as we can. And I see a few questions coming into the chat already. So that's great. Keep them coming.

All right. So now, let's get into the six primary indicators of performance. They are employment rate in the second quarter after exit, employment rate in the fourth quarter after exit, median earnings in the second quarter after exit, credential, measurable skill gain, and effectiveness in serving employers.

So for youth these first two indicators, the second and fourth quarter indicators, are different from adult programs, which means they're different from adult, dislocated worker, employment service, Title II, and Title IV. The Title I youth program is the only one of the six core programs under WIA that uses the definition that I'm about to talk about for the second and fourth quarter measures, and we think this is a really good thing for us. So the measure is the percentage of participants who were in education or training activities or in unsubsidized employment during the second quarter after exit.

So successful outcomes for the Title I youth program include unsubsidized employment, secondary education, postsecondary education, and occupational skills training in the second quarter after exit. So all four of those types of outcomes count as a success for youth in this indicator, whereas for all of the other core programs that serve adults, they only recognize unsubsidized employment as an outcome.

So, for example, if you had someone co-enrolled in Title I and Title II or Title I youth and Title II or Title I youth and Title I adult and they went into college after exit, they'd be a success in the Title I youth program but they would not be a success in the other programs. So we're pretty happy that we're able to count that as a success since many of our young people are moving into postsecondary education and training after their time in the WIOA youth program.

Another thing to keep in mind about this indicator is, unlike WIA, for WIOA success in this indicator is based only on the status in the second quarter after exit, regardless of their status at program entry. So, for example, if you're working with an in-school youth who's in high school when they enter the program and then they're still in high school when they exit the program and still in high school in that second quarter after exit, they're a success in this indicator even though they were already in high school at program entry.

The same was not true in WIA. Same example applies to someone who is in employment when they enter the program. If they're in employment when they enter and they're employment in the second quarter after exit, they're still a success. All that matters is what is their status in that second quarter after exit. And just to make sure everybody understands what I mean by the second quarter after exit, I'll give a quick example.

So today is October 25th. Let's use that as the individual's exit date. If they exit the program on October 25th, that means their exit quarter is the October 1 through December 31 quarter. Then the first quarter after exit is January 1 through March 31, and the second quarter after exit is April 1 through June 30th of 2018.

So anyone who exits today on October 25th, they need to be in either employment, secondary or postsecondary education, or training between April 1 and June 30th of 2018. And as long as they're in one of those outcomes for one day in that quarter, they're a success in the indicator. The bar is just one day of employment or one day of postsecondary education.

Now, let's talk a little bit about the second measure, which is the fourth quarter indicator. This is very similar to the indicator I just covered. The only difference is we're looking at a different time period. We're looking at the fourth quarter after exit. So in the example I just talked about, instead of looking at the April through June 2018 quarter for that individual who exited October 25th, we are going to go out two more quarters.

So the third quarter is July 1 through September 30th, and then the fourth quarter is October 1 through December 31 of 2018. So for this example of an October 25th exit date, we are looking at October 1 through December 31 of 2018, and as long as they're in a successful outcome, whether it's employment, secondary or postsecondary education, or training, they're a success in this indicator.

Again, the adult indicator for all the other core programs are different than this one in that they only recognize unsubsidized employment as an outcome. And for this one, just like the other indicator, it's based solely on status in the fourth quarter after exit. Doesn't matter what their status was when they entered the program. Doesn't matter what their status was in the second quarter. Under WIA we had a retention measure where we looked at how an individual was doing in the first quarter and then again in the third quarter retention as a pretty common indicator to look at.

This is not a retention indicator. It's just a one-point-in-time indicator looking at that fourth quarter after exit. So an individual could not be a success in the second quarter measure where they weren't in employment, education, or training in the second quarter, but maybe you helped them out during follow up and now in the fourth quarter they are employed or now in the fourth quarter they are in community college and they could be a success in that fourth quarter indicator even though they were not in the second quarter. So we think that's a good thing.

All right. Moving on to the third measure, this is a median earnings measure. This one's pretty straightforward. It's median earnings of participants who are in unsubsidized employment during the second quarter after exit. So essentially, we are looking at those who are employed in the second quarter after exit, the subset of people who were a success in that first indicator for second quarter but only a success based on employment.

Somebody who was in postsecondary education in the second quarter but not employed, they're not in median earnings. It's just someone who is employed in that second quarter after exit, and we look at the median earnings of all the people in your program who have employment in that second quarter after exit. Hopefully, everybody knows what a median is. It's the middle number in a series of numbers. So this just looks at the median earnings of those who were employed in the second quarter after exit.

So those first three indicators I covered, those are the pretty straightforward ones. Now, these next two are definitely the more complicated indicators that we spent a lot more time in the guidance letter talking about these next two indicators, and I'll spend a lot more time on this webinar talking about them. There are lots of nuances to them, and it takes a little while to really understand how it all works for credential and measurable skill gain. So if you have questions, please enter them in the chat.

So let's start with the credential attainment rate indicator. This measure is defined as the percentage of participants who were enrolled in education or training, except for on-the-job training or customized training. We don't consider that education or training for purposes of this indicator. So participants in education or training, except for those two exceptions, who attain a recognized postsecondary credential or a secondary school diploma within one year after program exit. So there are lots of parts and pieces to that indicator. So I'm going to try and break down each piece so that this makes sense.

So first part is who's included. It only includes those who received training or education, and in a little while I'll talk about what that means for the youth program because we've defined specifically in guidance what we consider education or training for the youth program and make it real clear so you don't have to make that decision. Secondly, credentials can be obtained at any point during the program or within 365 days following exit from the program.

So if an individual's in the program for let's say 18 months, at any point during those 18 months, if an individual attains a secondary school diploma or a credential, you count that – you get to count that as success. And in addition, for those 12 months after program exit, which coincide with your 12-month follow-up period, you can also count a credential if it occurs. So if someone in the program 18 months, you really have a full 30 months – month period of time for them to obtain that credential.

And then this last bullet point, which is in bold, this is – this gets kind of tricky. If participant – if a participant obtains a secondary school diploma or recognized equivalent – so what I'm about to say here only applies to the secondary school diploma or recognized equivalent portion of the credential attainment. This does not apply to postsecondary credentials, but for a high school diploma or its recognized equivalent, if someone gets that type of credential, a second thing has to happen for them to be a success in the indicator.

They must also be employed or in an education or training program leading to a postsecondary credential within one year after exit. So for you to be a success – for the individual to be a success for secondary school diploma or equivalent, two things need to happen. First, they obviously need to get their secondary school diploma or equivalent, and secondly, in that time period post-exit, in that one year they either need to be employed or in education or training that leads to a postsecondary credential within one year after exit.

And if they don't get that second piece, then, unfortunately, because of the law structuring the measure this way you don't get to count them as a success. One other technical detail is the time period for employment for this piece of being employed is actually the first, second, or third quarter after exit rather than 365 days. The reason we did that is that's a data element that we already require you to collect. So we tried to make it pretty straightforward ad not have to collect a new data element for that.

OK. So let's talk a little bit more about who's included in the credential rate for WIOA Title I youth. I mentioned a little bit earlier that we specifically define what is considered education or training for the youth program, and this varies based on which WIOA program we're talking about. So the adult program has a little bit different definition for what they consider education or training, and so it's important for WIOA youth programs to understand what we consider education or training. So let's talk out-of-school and in-school youth since those are our two types of participants.

All in-school youth are automatically included in the credential rate. Reason being is they're in school. They're either in secondary education or postsecondary education. So that is obviously education, and anyone in education or training is in the measure so that we keep it real simple for in-school youth. If they're an in-school youth at date of participation, they are in this indicator. Out-of-school youth it's a little bit trickier.

Not all out-of-school youth are included in this indicator, and, in fact, I think there will probably be a lot of out-of-school youth that never get included in this indicator. So the way an out-of-school youth gets included in this indicator is based on a few different things that would happen. Number one, the occupational skills training program element is provided, and that is the only program element that we have set for out-of-school youth, if they receive this program element, they're automatically in the indicator.

And I want to make a distinction with another program element we get asked about a lot, which is the work experience program element. We do not consider work experience to be training. So if somebody is in work experience, they are not automatically in this indicator if they're an out-of-school youth.

Occupational skills training is one way for an out-of-school youth to be included, and then the others are if they get reconnected to secondary education at or above the ninth grade level, if they get connected to postsecondary education, if they get connected to adult education, if they go into the YouthBuild program, or if they go into the Job Corps program. We consider all of those to be education or training, and so if any of those occur for an out-of-school youth, they're included in the indicator. If none of those occur, an out-of-school youth is not included in the credential indicator.

Some credential attainment parameters, you are only included in the numerator and denominator of the credential indicator one time, regardless of the number of credentials attained. So, for example, if someone obtains both a secondary school diploma and some other type of credential, let's say some type of industry certification, they would only count one time in the numerator and denominator, even though they have attained two types of credentials. We would still record that information in our individual record, our PIRL, but you only count one time in the indicator. The unit of analysis is participants not numbers of credentials.

So there are a number of different types of credentials. I already talked about the secondary school diploma or recognized equivalent. In addition to that there's also associate's degree, bachelor's degree, occupational licensure, occupational certificate such as registered apprenticeship certificates or career and technical education certificates, occupational certifications, or other recognized certificates of industry or occupational skills.

So I'll talk a little bit more about the definition of credential, and I got to say that probably the most common question we get of almost any question out there is, does such and such a credential meet the definition? So we've attempted to try and define this measure so that you can make that determination for yourself or that at the state level they can make that determination for you. So here are some of the highlights of the credential definition.

It's awarded in recognition of an individual's attainment of measurable technical or industry/occupational skills necessary to gain employment or advance in an industry or occupation. This is a little bit different from the definition under WIA in that we added the word industry in here. It used to be measurable technical and occu- – or occupational skills, but we broadened it a little bit to include both industry and occupational skills because there are some skills out there – a good example is IT skills – that it might not apply to a specific occupation but it's more of an industry skill. And so you can count those types of industry skills that lead to a credential or that result in a credential, I should say.

The technical or industry/occupational skills need to be based on standards developed or endo- – and endorsed by employers or industry associations. We get asked a lot about career readiness certificates, and neither certificates awarded by workforce boards nor career readiness certificates are included in the indicator because neither document measurable technical or industry/occupational skills. They document more foundational skills, not the technical, industry, or occupational skills.

And then lastly, the credential must recognize technical or industry occupational skills for specific industries or occupations rather than general skills related to safety, hygiene, et cetera, even if those general skills certificates are broadly required to qualify for entry-level employment or advance in employment. A couple examples of that are CPR certificates. So we get asked about that one a lot or OSHA 10 training. We get asked a lot about that one. Those are examples of general skills related to safety, hygiene, et cetera. They are not technical or industry/occupational skills.

Quick definition of a secondary school diploma. This is all discussed in TEGL 10-16 and TEGL 10-16 Change 1. The key here is the secondary school diploma needs to be recognized by the state and included in accountability purposes for the Every Student Succeeds Act. As it relates to secondary school equivalency, key for that one is, again, it needs to be recognized by the state. And if you have questions about high school diploma or equivalent, the best place to go is always to your state education agency.

Now, a few examples of credentials that count, and as I was saying earlier, probably the most common question that we get is, does a specific credential count? And I'm sure there are some questions in the chat box about specific credentials and whether they count or not, and our answer to those, except in rare exceptions where it's a credential we get asked about over and over again and we realize we do need to look further into it and make a decision, is that the Department of Labor cannot be in the business of ruling on specific credentials.

There are literally thousands, if not tens of thousands, of types of credentials out there, and it would be impossible for us to research and rule on each one. So we've attempted to create a definition that will help you make a decision about what counts as a credential. And if it's completely impossible, we can probably step in and help, but for the most part, as a general rule, we're not going to step in and make a determination about whether a specific credential meets our definition.

But I have provided some examples of common credentials that we see that do meet the definition, and then on the next slide I'll show you some common examples of ones that don't meet the definition. So Certified Nursing Assistance license is a really good example of an occupational licensure. That's one we see a lot of our young people getting. And then another example, Automotive Service Excellence, ASE Certification, that's a really good example of occupational certification.

Now, similarly, there are some common certificates that we see asked about a lot that don't meet our credential definition. I mentioned a few of these already. The Occupational Safety and Health Administration 10-hour course that provides awareness of job-related common safety and health hazards, good thing to do, but that's not one that meets our definition of credential. Work and career readiness certificates, also very good thing to do. We see a lot of value in those.

They help develop foundational skills for participants, and providing work and career readiness is critical to young people, particularly before they enter either a work experience or enter unsubsidized employment. You want to make sure they have those important career readiness skills but those are foundational skills and a career or work readiness certificate does not meet our definition of credential. And then another good example of one – this comes from Title IV – is completion of an assistive technology training program.

All right. So that was credential. Hopefully, folks are up to speed on the credential indicator. I see lots of questions coming in on that. Hopefully, we'll get to those, if we have time, at the end. I should say, if we don't have time to get to all of your questions, you can always e-mail us at dol.wioa@dol.gov, and we'll put up that e-mail address at the end for where to send your questions that didn't get answered today.

Let's talk about the measurable skill gains indicator. This one measures the percentage of program participants who, during a program year – and that's a key phrase, during a program year, which I'll talk about shortly – who were in education or training program that leads to a recognized postsecondary credential or employment or who are achieving – and – sorry. I should say and who are achieving measurable skill gains, defined as academic, technical, occupational, or other forms of progress, towards such a credential or employment. So that's a mouthful, and I'm going to break this definition down for you, and I'm going to talk specifically about for youth, who gets included in this indicator.

Like the credential indicator, you only count one time in the numerator and denominator in a reporting period. That piece is different for – than credential, but the fact that you're only counted one time in the numerator and denominator is similar – regardless of how many skill gains you attain. So an individual could attain three skill gains in a given program year, but they're only going to count one time in both the numerator and denominator.

The only exception is if someone has one or more periods of participation in a program year, and what that means – and this should either occur extremely rarely or not at all – is an individual is in the program, then they exit the program because they have 90 days of no service, and then they come back into the program and that all happens in the same program year. So essentially, they are a participant. They exit, and then they're a new participant all within the same program year.

If that happens again, then they could be in this measure two times, once each – when they're in the program, so in that first part of participation and then the – when they come a participant again, they could be in the measure a second time. But we wouldn't anticipate many exits and re-enrollments all occurring in the same program year. Another key piece is the measurable skill gains indicator measures progress in a program year. It is not exit-based. It's the only one of our indicators that is not exit-based.

So participants who are in education and training are included in the indicator, regardless of how long they have participated in the program year. So this slide gets to that first quiz question that we talked about where that – if you remember, that quiz question talked about someone who was an in-school youth who was enrolled in the program in June of 2017 and they were included in the measurable skills gain indicator in program year 2016, meaning the time period of July 1, 2016 of June 30, 2017.

And the reason that is correct is because the way this indicator is structured – for better or for worse, this is how it was defined in the act – is that an individual who is enrolled in June is still in the indicator if the individual meets the parameters for inclusion in the indicator, meaning if they're in education or training.

So if someone gets enrolled very late in the program year, as long as they're in education or training, they are in the indicator. And so a lot of people talk about this isn't fair, and we got lots of comments after the Notice of Proposed Rulemaking that maybe we should exclude people in the last quarter of the year from this indicator.

And we looked into it, but because of the way the law defines this measure, they have to be included if they're in education or training in the program year because the law defines this as a program year indicator. So if someone enrolls in the program in – late in the program year, the last couple weeks in the program year and they're in education or training, they are in this indicator for that program year.

And when Cesar talks about the negotiations process, that's the point in which you can kind of factor in how many people enter the program late in the program year and talk about how it impacts your measurable skill gains rate and hopefully negotiate a little bit lower goal, if you can show that you have a decent amount of participants that enroll late in the program year.

But the key here is that we don't want you to delay enrollment or services to participants until a new program year, even if you believe there is not sufficient time for participants to make a skill gain by the end of the program year. We recognize that it's frustrating to include someone late in the program year when they don't have time to make the gains, but we can take care of that in the negotiations process. It's just the way the measure is in the law.

Now, let's talk about who's included in the measurable skill gains indicator for youth. Just as I talked about in the credential indicator where we defined education and training for inclusion in the measure differently than some of the other core programs, we also define education or training differently from some of the other core programs for the measurable skill gain indicator.

The good news – and we did this on purpose – is we defined education or training for inclusion in the measurable skill gain indicator the exact same way we define it for credential. So those same parameters I talked about where all school youth – all in-school youth are included and only out-of-school youth who are either in occupational skills training or get reconnected to secondary education, postsecondary education, adult education, YouthBuild, or Job Corps are in this measurable skill gain indicator.

So you don't have to learn two different definitions of education or training for youth. That same definition for credential is true for measurable skill gain. And so if you're in education or training, based on this definition you would be included in both credential and measurable skill gain for youth.

One note is that this is different than in the adult program where they had aligned it in the exact same way so the definition for who's included in credential versus measurable skill gain in the adult program is different between the two, whereas it's the same for us.

So in the Final Rule and in our guidance we identified five categories or types of measurable skill gains, and I'll cover each of these quickly. The first one is achievement of at least one educational functioning level, if receiving instruction below the postsecondary level. And so this, if you were around during WIA, is very similar to how we measure literacy numeracy gains. We used those educational functioning levels, which come from the adult education world, and so this gets to basic skills attainment and if an individual has attained an education functioning level within the program year.

Second skill gain type is attainment of a secondary school diploma or equivalent, and note that if you attain a secondary school diploma or equivalent, that would count as a success both in credential and in measurable skill gain.

Third skill gain type is secondary or postsecondary transcript for sufficient number of credit hours. So for secondary education this is a transcript or report card for one semester that shows a sufficient number of credit a sufficient – sufficiency, and we don't define what it has to be on the transcript or report card. It just has to indicate that they're doing well in school. So you get to define that at the local level. And then for postsecondary it needs to be at least 12 hours per semester or for part-time students a total of 12 hours over the course of two completed semesters in a 12-month period.

So for those first three skill gain types there's not a ton of flexibility, particularly for the education functioning level gains and the secondary school diploma or equivalent. You either get the gain or you don't. There's not a lot of defining that has to occur at the state or local level, whereas the next two skill gain types I'm going to talk about, gain types four and five, they do have a little bit more flexibility in them, and that's purposeful. Some people appreciate that flexibility and like the opportunity to define it at the state or local level. Other people just would prefer that we get more specific. But for these two skill gains you do have a little bit of flexibility.

So the fourth gain type is satisfactory progress report toward an established milestone from an employer or training provider. So the flexibility comes with that word progress. What is satisfactory progress? And that's something that you should define at your state or local level. And then the last skill gain type is passage of an exam required for an occupation or progress attaining technical/occupational skills as evidenced by trade-related benchmarks. And again, there's that word progress, and that's where your flexibility is in defining what progress is.

Some operational parameters specific to the WIOA youth program for measurable skill gain is we use all five of those measurable skill gain types. That's not true for some of the core programs. Particularly Title II does not use all five skill gain types, but for Title I youth we use all five skill gain types. So if an individual gets a gain in any of those five skill gains, then they're a success in the program year.

Second thing to note is that there's no specific measurable skill gain type that's required for a specific youth participant. So, for example, if you're working with an out-of-school youth who is working on their GED and they're in Title II education or basic education, just because they're working on their high school equivalency doesn't mean that you have to include them in the – it doesn't mean that they have to get the first measurable skill gain type, that EFL gain type.

Or if someone's basic skills deficient, it doesn't necessarily mean that they have to get that EFL gain type. If they're basic skills deficient, it probably makes sense to work with them on their basic skills, but unlike the literacy numeracy measure for WIA where if you were an out-of-school youth you were automatically included in it if you were basic skills deficient, that's not true here. Any skill gain type would count as a success for that type of youth.

And we recommend that the type of skill gain you work on should of course be based on the youth's individual service strategy. So it's all based on the individual youth needs, and any of the gain types that occur in a given year would count as a success. So that's measurable skill gain.

I'm going to just briefly talk about our last indicator, and the reason I'm only going to briefly cover this is because this is a system measure. The effectiveness in serving employers, it's a system measure jointly reported across all core programs, so across Title I, adult, dislocated worker, and youth, Title II adult education, Title IV vocational rehabilitation and the employment service program. Those six core programs jointly report just one time on this indicator. So you won't have an effectiveness in serving employer measure just for youth. You have it for the whole system for those core programs.

Now, we've provided three options for this indicator. This indicator is brand new. It's in the pilot phase, and so – and it will be in the pilot phase for a while, which is a good thing. And so we've asked that states choose two of the three options that we've identified for this indicator. Those three options are retention with the same employer in the second and fourth quarters after exit, the employer penetration rate, repeat business customer rate. So states choose two of those three, and then in addition, states have the option of piloting their own indicator, if they've found or come up with a good idea that we haven't to help us gain information on what's the best way to measure effectiveness in serving employers.

And then one last thing I wanted to note before I turn it over to Cesar is that we're still really early in implementation of these new indicators. While WIOA was implemented in program year 2015, these new indicators weren't implemented until the second year of WIOA, program year 2016, which started July 1, 2016. So we've just completed one program year for these indicators, and we're just now getting the first annual report on that program year this month.

So it's still brand new. We have a chart that shows the timing of the indicators. As you can see from the chart, we still don't have data on all the indicators. For this program year that just ended, PY 2016, really the only indicator we have data on is measurable skill gains, and that's a brand new indicator we've just implemented. So we're still learning about that one, and then one of the three effectiveness in serving employer indicators we'll have data on.

In program year 2017, the program year that we're currently in that goes until June 30th of 2018, we'll get a little more data, but we still won't have full data on at least three of the indicators, the fourth quarter employment, education, and training rate, the credential rate, and one of the types of effectiveness in serving employers measure. And it's not until program year 2018 that ends June 30th, 2019 and then we get the final report on it October 2019 where we'll have full data on all the indicators. So as you can see, we're still in kind of the pilot data collection phase of this, and we won't have a lot of information that tells the story of all these indicators for another year or so.

So with that I'm going to turn it over to Cesar to quickly talk about our overview of negotiations and the statistical adjustment model and what you need to know as a youth practitioner about those. Cesar?

CESAR ACEVEDO: Thank you, Evan. Thanks for having me today. So yeah. So we're going to jump right into it, and we'll start talking about the requirements set in the law on achieving levels of performance for each of the primary indicators. So first, the law states that we have to negotiate in two-year intervals, beginning with the first two years and then with the third and fourth years. So those first two years were PY 2016 and 2017, and those were handled in TEGL 20 – 26-15 was our negotiations guidance for those two years, and we're currently working on negotiations and sanctions guidance for program years 2018 and '19.

Second is the consideration of four factors when negotiating performance for each indicator. So we're going to go over those four factors in the negotiations process in the slides coming up. And then lastly is the use of the statistical model to make adjustments to those negotiated levels after the close of the program year. And when we talk about that, we'll focus on what Evan alluded to earlier is that's our opportunity to adjust for serving those hardest to serve youth and making sure that we account for those efforts. Next slide.

So here are the four requirements. States will work with their regional Department of Labor offices to negotiate and agree to performance levels based on these requirements. You can see we've bolded the one about the statistical adjustment model. The other three are – we've done these in one form or another in the past. They should not be anything new. Next.

So here we have the requirements set in the law on the statistical adjustment model. These are the specific elements required by the law. So you have unemployment rate and differences in job losses or gains by industry, and those are going to vary by state. And then we also have things like work experience and literacy. So next slide, please.

So these boil down to two types of elements in the model. So we have participant characteristics, and in the model we've expressed those as percentages of total exiters for the particular cohorts. And the economic conditions we've expressed as percentages of total employment by the industrial sector and then in addition to the state unemployment rate. Next, please.

So in addition to those required elements, we added other participant characteristics that we felt could make the model more precise and lead to a better predictive power. So things like gender and age, education level, employment status at participation, those things were not required in the law, but we've added them to increase the power of the model.

So we have here two references for our methodology on the model and how we landed where we did. The first one there is about 110-page paper with all the charts and graphs you could ever hope for. The second one is an attachment to that negotiations TEGL I mentioned before. It's more of an executive summary, a brief overview of all the variables in the model, how they're specified, and then how they're used. Next slide.

So all the work on the model to date was done with WIA performance data. This came with some limitations. There were a few indicators that we could not estimate with confidence. So we labeled those as baseline indicators. Those indicators by core program are here. For Title I, measurable skill gains, we did not feel comfortable using any of the literacy numeracy information to kind of expand on this measure.

Second was effectiveness in serving employers because it was completely new, and third was median earnings. This was largely due to lack of earnings data on youth in the youth records. And then for Title III, the effectiveness in serving employers was also a baseline indicator. So these baseline indicators were not negotiated the first two years, and they will wait until we have two years of WIOA data to support a useful model in the negotiations process. Slide.

So next, determining success or failure. This gets to the last requirement set in the laws where we had to make sure we're using an adjusted – an objective statistical adjustment model to adjust for actual conditions after the close of the program year. This is another opportunity for the youth programs – gives us the ability to count for your efforts to provide services to the hardest to serve and under-served youth. So this is our chance to reset expectations and be sure that we're not setting too lofty of a performance target. And then the requirement is that we adjust for changes in participant characteristics over the course of the year and then also for any changes in economic conditions that were not made prior to the year.

So your key takeaways from the negotiations segment and the statistical model is that there are many indicators still in the baseline period. Again, this is our chance to reset those expectations, make sure we're getting the most accurate data reported as possible, and all of this information in these first few years will feed into models to come. Second is to keep in mind that characteristics of hard to serve youth are factored into the adjustment model, and we'll use them to lower your targets accordingly after the close of the program year.

And then third, things you want to keep in mind for the negotiations process is the impact on the median earning indicator by youth that are part-time employed and are included in the measure. So we all know that they will not earn as high earnings, but this should be accounted for in the negotiations process. Same goes for measurable skill gains for those late enrollees in the program year. You can bring that information to the negotiations table, and we can adjust the performance targets accordingly. Next slide.

So with that – we ran through that pretty quickly. So we're going to be here for a little bit with questions, and I'm going to pass it back to Evan.

MR. ROSENBERG: Great. Thanks, Cesar. Really appreciate you sharing that information. I've been monitoring all the great questions that have come in as you were presenting, and so I want to get to those questions pretty quickly. So I'm going to just do a couple more slides really fast and then we'll get to all your questions and we should have about 20 minutes left for questions.

All right. So we have a number of resources to help you, and we put those up. One is the act itself. There's also the Joint Final Rule. Please note that the information on the performance indicators are in the WIOA Joint Final Rule, not the DOL-only Final Rule, which is where you find the information specific to the youth program that we covered in the eligibility webinar yesterday.

And then Training and Employment Guidance Letter 10-16 Change 1 is probably the most important source of performance information, and I talked about that earlier. In addition there's the WIOA resource page at doleta.gov/wioa as well as the performance and result website, which I spent a lot of time on personally. That's doleta.gov/performance, and I definitely encourage you to check those two out.

So now, let's put up the next polling question, and we're going to do a little post-test poll to see how well you paid attention. Hopefully, this is a fairly easy question to get. So if you could post the poll, please, that would be great, and I'll read our polling question. So the polling question is, if a youth is determined eligible on September 1st and receives an assessment and an individual service strategy on September 12th and then receives their first WIOA youth service on September 22nd, what is their date of participation, which is what's their official date that they enroll in the program and we call that the date of participation? Is it the first choice, September 12th, second choice, September 22nd, third choice, September 1st, or the fourth option is they have not yet met the criteria to be a WIOA youth participant? So I'm going to give you a minute to take that question in and give us your answer and then I'll be back in about a minute to discuss the results.

All right. I'm starting to see results come in. I think I have a little bit of delay on my end, but so far it is overwhelmingly the second option, September 22nd, which I am very pleased to see as that is the correct answer. So good job. You all were paying attention, and the reason it's September 22nd is because, as I talked about earlier, four things need to occur in order for them to become a participant, eligibility determination, assessment and individual service strategy, and finally, WIOA youth service. And because the fourth thing didn't occur until September 22nd, September 22nd is their date of participation. So nice job on that poll.

All right. So now, let's get to the questions. We had lots of questions come in. So I'm going to start to take your question. All right. Let's see.

First question, "When do we claim outcomes? Do we wait for the youth to exit, or are we waiting for a soft exit after 90 days?" So you don't need to do anything to claim outcomes, or you don't need to think about any timing to claim outcomes. You should serve the young person the way you normally serve them. Exit occurs, as I talked about, based on no service for 90 days, and then the date of exit is retroactive to the last date of service.

And the way each of the individual performance indicators are calculated will determine when outcomes occur or when you claim outcomes, so to speak, but it's all dependent on an individual's exit date for all of the indicators, with the exception of measurable skill gains. So the outcomes occur for that first indicator in the second quarter after exit. The outcomes occur for that second indicator in the fourth quarter after exit. For median earnings it's the second quarter after exit where the outcome occurs.

For credential it's the fourth quarter after exit when the outcome occurs because we wait that full four quarters for them because that's how long they have to attain the credential. And then for measurable skill gain, that's the one exception where the outcome occurs at the end of the program year. So don't think about it as when you claim the outcomes. Just think about it as the outcomes occur based on how each indicator is defined.

Next question, "Do supportive services delay exit?" And that is a great question. I talked about the three things – types of services that don't delay exit. One is follow-up services, two is information-only services, and three is self-services. And as you may remember, supportive services were one of the examples of a type of follow – of a type of service that can be provided during follow-up.

So the answer to your question, do supportive services delay exit, is it depends, and it can be a conscious decision on your part. So hopefully, in your management information system you have the ability to code a supportive service as either a follow-up service or a regular service, so to speak, a non-follow-up service. I'm hoping that all state management information systems are coded that way.

And so if you code a supportive service as a follow-up service, meaning they've exited and they're in follow up, that supportive service wouldn't delay exit, but if you code a supportive service as a regular service, then it would delay exit. And so it really depends on the context of the young person and if you want them to exit or not. You believe they're in a place to be exited, then maybe you want to code that supportive service as a follow-up service rather than a regular service.

All right. Moving on to the next question. If a planned service – "If a service is planned for 95 days after the last service, then can the student remain active?" And the answer to that is yes. As I talked about in the definition of exit is exit is no services for 90 days and no future services scheduled.

Now, it needs to be an actual service scheduled. It can't be we think the individual is going to need something else in 91 or 95 days. Therefore, they don't get exited. It's you have a specific training or a specific service that can't occur until 95 days and hopefully you have a way in your management information system to code in that there's a future service scheduled in 95 days and then the management information system will know that and won't exit them after 90 days of no service.

All right. Next question. "Regarding the four activities prior to being included in performance" – I'm assuming you're referring to the four things that happen prior to someone being an official participant in the program – "could you give one of the 14 program elements without an objective assessment, and would they still count in performance?" So the quick answer is that they wouldn't be a participant until four things occur. Now, I would say, almost without exception, the fourth of those four things should be the program service.

Definitely eligibility determination should happen first and you would think that the receipt of one of those services should happen after the ISS and objective assessment but there's no requirement that that has to occur. If they were in desperate need for some type of service before you did the ISS or objective assessment, there's nothing that prevents you from doing that. But unless there's a very strong reason why they would need that service before the ISS or objective assessment, I wouldn't necessarily recommend doing that, but there's nothing that would prevent you from doing it.

All right. Next question. "Do supportive services while in follow up include paying state-approved supportive services such as childcare, transportation, et cetera?" And the answer to that is yes. Supportive services were one of the five types of services that can be provided in follow up, and transportation and childcare are very good examples of those supportive services. Keep in mind that this is specific to the WIOA Title I youth program. I'm not sure that the same applies for the adult program. I know they have some different rules around what can be provided as follow up and if supportive services can. But for youth, yes. That can happen.

"Our bus passes a supportive service in follow up?" Just as I talked about a minute ago with transportation, yes. That is an allowable supportive service, at least from the federal perspective, that can occur during follow up. Keep in mind that a state or local area can always choose to put on a specific restriction where, for whatever reason, they don't want to provide a certain type of supportive service during follow up. But from the federal perspective, you are allowed to do that for the Title I youth program.

Another question, and this relates to the second and fourth quarter indicators, the first two indicators that I talked about. Someone asked about the military. "What about military? Isn't that a positive outcome?" And I saw that question come in a couple times, and the answer is yes. Military is a positive outcome.

Where the military falls under is unsubsidized employment, and in the PIRL we actually – we break it out and have military as one of the choices, I believe, just to see how many of our participants are going into the military. The reason I didn't have it on my slide is because the military is an example of unsubsidized employment, but yes. Absolutely the military counts as a positive outcome for both the second and fourth quarter indicators.

Next question, "How can we keep a youth active if the activity we want to enroll them in doesn't occur for four months?" This sounds more like a question for your state or local area management information system. Hopefully, you have a mechanism in your management information system to schedule future services, and by scheduling that future service, it would prevent them from exiting after 90 days. But policy-wise from the federal perspective, you're allowed to do that, as I talked about, and you should check in with your state or local area on how to make that happen in your management information system.

All right. Next question, "Since secondary education for youth will count positive if they are still in school in the second quarter after exit, wouldn't they count negative under the credential attainment since they didn't show credential attainment prior to exit?" And the answer to that is not necessarily. As I talked about in the credential attainment indicator is they have up to one year, 365 days after exit to gain that credential. So someone could be in secondary education at exit. Maybe they're still in 12th grade, and then they get their high school diploma in that 12-month period after exit. So in that example they could exit prior to completing high school and still be a success in the credential indicator.

Another question, this is a good one. We get this one a lot. "Is Job Corps considered a placement?" I'm assuming that means does Job Corps count as one of those successful outcomes for the second and fourth quarter after exit. And the answer to that is it depends. Job Corps can be considered occupational skills training and, therefore, it would count as that training placement that WIOA youth recognizes.

However, I talked a little bit about common exit, and if a state is practicing common exit, which they can only do within DOL programs, and the state chooses Job Corps as one of the programs that they use with Title I for common exit, then Job Corps, instead of being considered an outcome, would actually be considered a service that they're co-enrolled in and then it would not count as a placement.

So it really depends on if you're a common exit state and, if you are, if you include Job Corps in that common exit policy. And if they are part of that common exit policy, then the answer is no. That wouldn't count as an outcome because you wouldn't be exiting them until after they finish Job Corps. But if you're not using Job Corps as part of your common exit or you're not a common exit state, then yes. Job Corps can count as a successful outcome for the second and fourth quarter indicator.

All right. Another question, and this is a good one. We get asked this one a lot. "Does follow up begin when you have an expected date of exit, or does it begin when the exit occurs at 90 days?" So the time period of follow up is based on the date of exit, and as you know or as you learned today if you didn't know before today, that date of exit is retroactive to the last date of service. So for the 12-month period of follow up, if someone exits today, October 25th, that's when their follow up starts, on October 25th.

You wouldn't know that until 90 days goes by, roughly February 24th or 25 or whenever 90 days is. I didn't do the exact math, but a lot of times you know about an expected date of exit. You provided the services. Maybe they moved on to postsecondary or they moved on to employment and you know that October 25th is going to be their last date of service.

There's no reason you couldn't start follow up on October 26 and be providing supportive services that you code as follow-up services or providing other follow-up services. And you're absolutely allowed to start providing follow-up services based on an expected date of exit, or you have the option to just wait until that official exit occurs and start doing your follow up. But our recommendation is that, if you know it's an expected date of exit, to begin follow-up services then.

All right. Next question, "If a youth has a job upon enrollment, are they still included in the second quarter, fourth quarter measures?" And the answer is yes. I did talk about that in the presentation. Even if a youth is employed when they enter the program, they are still included in the second and fourth quarter indicators, and they are still a success if they're employed in the second and fourth quarter. It does not matter what their employment status is at enrollment.

Similar question, "If a participant is enrolled in college at exit, are they considered a positive in the second quarter after exit if they're still enrolled in college?" And the answer is yes. It's simply just looking at that second quarter time period and seeing if they're in any of those positive outcomes. It doesn't matter where they were at exit. It doesn't matter where they were at time of enrollment. All that matters for that indicator is where they are in the second quarter after exit.

All right. Let me scroll down for a couple more questions. Someone asked, "What is an example of a participant being placed in secondary education by the second quarter after exit?" So don't think about those second and fourth quarter measures as placement measures. They're not placement measures. They're just period and time status measures.

So it's not like you have to put the youth into secondary education in second quarter after exit. They could have been in secondary education the entire time in the program and they're still there in the second quarter after exit. I think the key is not to think of it as a placement measure and just think of it as what's their status in the second quarter after exit.

All right. Another question. I think this is based on that example I gave of exiting on October 25th. Someone says, "When you say success between October 1 and December 31, if they are successful in October and lose their job in November, are they still a success?" And the answer to that is yes. Our bar for success for those second and fourth quarter indicators is one day, and the reason it's such a low bar is because the primary data source for employment is unemployment insurance wage records.

And if there are any earnings in the wage records, meaning just one day of employment, that's enough to be successful. So if in that second quarter after exit or fourth quarter after exit they're employed for part of it but lose their job during it, they still count as a success.

Another question, "If a youth is in occupational skills training that is not funded by WIOA Title I or PELL, do states report that training in PIRL 1303 type of training service?" The answer is yes. It does not have to be funded by our program. Any type of training should be reported in that data element.

Another question. "I was taught to keep a youth in active participation until they graduate high school, even though they are no longer in need of services, just to gain the credential. Is this not actually needed?" So for this one I would really encourage you to provide services and base decisions on what the individual needs, not based on our performance accountability system. So if someone's still in high school and they no longer have need for services, you shouldn't keep providing them services.

Now, if you think that they're at risk of dropping out of school and you still want to provide some services to make sure they graduate high school, that makes a lot of sense, and absolutely do that. But I would not recommend just keeping them active in the program for the sake of the performance accountability system. And as I said earlier, that credential indicator you count any diploma or credential that occurs up to one year after program exit. So you still have that opportunity to get that credential within one year after exit.

Another question, "My understanding is that in-school youth would fall into four performance measures; correct?" And the four measures they listed were measurable skill gain, credential attainment, second and fourth quarter after exit measures. And the answer to that is that's not necessarily correct. An in-school youth could fall into the fifth indicator that wasn't listed, the median earnings gain indicator if they're in employment in the second quarter after exit.

So inclusion on that median earnings indicator has nothing to do if they're an in-school or out-of-school youth and has everything to do with where they are in the second quarter after exit. And so if it's an in-school youth that was in high school when they enrolled in the program and the second quarter after exit they're – they have a job, they're in unsubsidized employment, they would also be in that median earnings indicator.

Only have a couple minutes left. So I'm going to take just one or two more questions, and again, if we didn't get your questions answered, feel free to e-mail us at dol.wioa@dol.gov. So let's see. Let me find one or two more questions.

"How long can we wait between enrolling someone in out-of-school youth if they were previously enrolled and in-school?" And my answer to this – and you can choose to take my advice or not – is you should never exit someone and re-enroll them just to change their school status. We want you to keep serving young people and keep them active in the program for as long as they need services.

And so if someone comes into the program as in-school youth, that's their status throughout the program, and we don't want you to exit them and then re-enroll them after 90 days to make them out of school just so you can then code them as out of school. Please just keep them enrolled and active in the program as long as they need services.

And I'll take one more question. Someone asked, "So are you saying it would be better to exit an in-school youth in their junior year if they had a part-time job?" And again – and this is kind of along the theme that I've been saying – is please don't choose to exit young people based on when you can count them in performance.

Exits should occur based on when they no longer need services, and so if they still need services in the program, you should serve them. You shouldn't think, oh, junior year. Good time to exit because I can take the success for secondary school and then they'll get the credential right before that fourth quarter after exit and I can take the high school diploma. Just serve them based on their needs, for what they need, and I think for the most part you'll still be successful, if you provide them good services and base the amount of services on their needs and not base exit on trying to count specific performance indicators.

So I'm sorry if I didn't get to all your questions. We had lots of great questions. At my count we had about 77 questions, and I think I got through about a third of them. Again, please e-mail us if you have further questions, and with that we're going to – I'm going to turn it back to the Maher folks to close us out for today.

(END)