

Performance Accountability and Data Collection

Co-Leads: Dawn Axsom (DWD) and Miche Grant (Region 1)

Co-Lead: Dawn Axsom (DWD)	(812) 830-0203 draxsom@dwd.in.gov
Co-Lead: Miche Grant (R1)	mgrant@innovativeworkforce.com
Allison Leeuw (DWD LMI)	317-233-2697 ALeeuw@dwd.in.gov
Deb Waymire (R4)	(765) 807-0882 dwaymire@tap.lafayette.in.us
Bill Miller EmployIndy	317-684-2242 wmiller@EmployIndy.org
Melissa Leaming (R6)	mleaming@work-one.org
Krystal Levi (R2)	574.855.6142 KLevi@gotoworkone.com
Edmond O'Neal (R3)	eoneal@neinworks.org
Jeff Russell (VR)	jeffery.russell@fssa.in.gov
Theresa Koleszar (VR)	Theresa.koleszar@fssa.in.gov
Anita McNallin (R10)	am@wda-inc.org
Nancy Karazsia (R8)	nkarazsia@dwd.in.gov
Chris Deaton (CTE)	cdeaton@dwd.in.gov
Lara Pastore (Adult Ed)	lpastore@msdwt.k12.in.us
Jennifer Biddle (DWD)	jbiddle@dwd.in.gov
Donni Barnes (R5)	dbarnes@workonecentral.org
Kurt Kegerreis (R9)	Kkegerreis@nationalable.org
Rick Lindsey (DWD)	rlindsey@outlook.com

Responsibilities

- Review DWD Policies 2013-04 (adult ed data collection and reporting); 2012-07 (eligibility and data validation); and 2012-06 (qualifying credentials for youth)
- Establish definitions as needed and consistent with future regulations as they are released. Sec 116
- Ensure wage record access as it affects all partners
- Recommend local negotiation process. 107(d)(9)

- Estimate expected levels of performance for **each** program for first two program years 116 (b)(3)
- Recommend any additional indicators 116(b)(2)(B)
- Plan for data integration, collecting, and reporting.
- Other issues as determined by the workgroup

Bi-Weekly Updates: [below]

WIOA Implementation: Sub- Workgroup Categories

Sub-Workgroup Area	Members	Draft Activities
Review Entire Bill	<ul style="list-style-type: none"> ■ Dawn Axsom ■ Miche Grant ■ Bill Miller ■ Krystal Levi 	<ul style="list-style-type: none"> ■ Determine if there are any other areas we need to address within the work group ■ Determine if any part of 116 should be brought to Nina’s attention that may belong to another work group and the best approach to assist the other work groups ■ ????
Policy/Definitions	<ul style="list-style-type: none"> ■ Deb Waymire ■ Dawn Axsom ■ Bill Miller ■ Nancy Karazsia ■ Theresa Koleszar ■ Lora Pastore ■ Tasha Johnson ■ Melissa Leaming- Leader ■ Miche Grant 	<ul style="list-style-type: none"> ■ Review sec. 116 to ensure the group has all information related to sub-work group activities ■ Determine definitions across core partners to develop a common language. EX: Assessment has different implications for VR and Workforce Development ■ Identify all current state policies/TABs across core programs that will be impacted and develop recommendations: Revision and what should be revised/ Recension and why/ New policy developed and potential contents from our area ■ ???
Performance/Negotiating Performance	<ul style="list-style-type: none"> ■ Deb Waymire ■ Melissa Leaming ■ Debbie Gibson ■ Kurt Kegerreis ■ Jeff Russell ■ Lora Pastore 	<ul style="list-style-type: none"> ■ Review sec. 116 and sec. 107(d)(9) to ensure the group has all information related to sub-work group activities ■ Identify current performance indicators across core programs ■ Research DOL WIOA page to acquire existing

	<ul style="list-style-type: none"> ■ Krystal Levi ■ Rick Lindsey ■ Donnie Barnes 	<p>related side-by-side comparison documents</p> <ul style="list-style-type: none"> ■ Establish process/factors/analysis for negotiating performance at state and local levels for recommendation ■ Identify requirements/spec for federal reporting ■ ???
Data Collection/ Reporting/ Wage Records	<ul style="list-style-type: none"> ■ Anita McNallin- Leader ■ Vickie Smith ■ .Chris Deaton ■ Dawn Axsom ■ Jeff Russell ■ Theresa Koleszar ■ Randy Frey ■ Krystal Levi ■ Rick Lindsey ■ Debbie Gibson ■ Donnie Barnes 	<ul style="list-style-type: none"> ■ Review sec. 116 to ensure the group has all information related to sub-work group activities ■ Develop an understanding of how data is collected across core programs and share with lager group ■ Identify new reporting requirements and develop draft strategy to collect new elements ■ Analyze T1screens to determine missing data fields needed for new requirements ■ Determine ICC/Interface factors ■ ???
Data Validation	<ul style="list-style-type: none"> ■ Anita McNallin ■ Jennifer Biddle ■ Vickie Smith ■ Debbie Gibson ■ Chris Deaton ■ Allison Leeuw- Leader ■ Jeff Russell ■ Rick Lindsey ■ Donnie Barnes 	<ul style="list-style-type: none"> ■ Review sec. 116 to ensure the group has all information related to sub-work group activities ■ Determine if data validation is required across core programs ■ Analyze current DV policies across programs (if they exist), identify existing processes/requirements that will be problematic with WIOA, develop recommendations for moving forward ■ ???
Review Regulations (short-term group)	<ul style="list-style-type: none"> ■ Bill Miller- Leader ■ Edmond O'Neal ■ Theresa Koleszar ■ Jennifer Biddle 	<ul style="list-style-type: none"> ■ Review regulations (once they are available) and compare to current ■ Report back to entire team changes and

	<ul style="list-style-type: none"> ■ Tasha Johnson ■ Miche Grant 	<ul style="list-style-type: none"> recommendations on moving forward ■ ???
Pay for Performance	<ul style="list-style-type: none"> ■ Jeff Russell ■ Krystal Levi- Leader ■ Edmond O’Neal 	<ul style="list-style-type: none"> ■ Review sec. 116 to ensure the group has all information related to sub-work group activities ■ WAFS Ticket # 6273 ■ ???

Performance Accountability and Negotiating Performance

February 25, 2015

Dawn Axsom, Chair; Donni Barnes, Jennifer Biddle, Jenny Brown Region 9 (new member Feb. 2015), Chris Deaton, Randy Frey, Debbie Gibson, Tasha Johnson, Nancy Karazsia, Theresa Koleszar, Melissa Leaming, Allison Leeuw, Krystal Levi, Rick Lindsey, Bill Miller, Anita McNallin, Edmond O’Neal, Lara Pastore, Laura Phillips (new member Feb 2015), Jeff Russell, Vickie Smith, Deb Waymire, Sue Zaring, Miche Grant Co-chair

Of the six sub Work Groups four are active at this time.

The group charged with **Reviewing the Entire Bill** to make sure we had captured all sections of the legislation relative to Performance Accountability is finished at this time with no additional recommendations.

Policy and Definitions (pertaining to performance accountability)

This sub Work Group has completed the preliminary tasks of organizing key questions that need to be addressed when ‘defining participant’ across core programs. They have also created the list of policies needing further review, updates, or deactivation which contain issues relating to definitions changing with WIOA. Their suggestions and recommendations will be discussed at the next full Work Group (to be held in March) and prepared for final submission.

Data Collection/Reporting and Wage Records has merged with the Data Validation Work Group and is addressing the following:

- A. Identify any additional programs within each of the Core Programs for which data is being collected:
 - Wagner-Peyser
 - Vocational Rehabilitation
 - Adult Education
 - Other State/Federal Programs
- B. Review of current policies within the Core Programs to begin identifying overlapping definitions and any eligibility and/or data validation requirements:
- C. Start identifying data collection requirements under WIOA based on current information available

Pay for Performance is a small Work Group that have completed their preliminary work and reported their recommendations to the full Work Group. After a discussion held at the next full Work Group meeting these recommendations will be finalized.

Performance and Negotiating Performance is one of the larger sub groups. They have conferenced two times and will finalize their broadly defined recommendations at the next full Work Group. These recommendations will be included into the overall Work Group recommendations to be submitted to the Transition Team mid- March. The work incorporated a detailed review of the NASWA document with areas of support and non-support written into their overall list of suggestions and recommendations.

The final group is **Review the Regulations, which** remains on hold until they are released.

The first phase for the Performance Accountability and Negotiating Performance Work Group is nearing completion. This preliminary period was intended to identify the key issues critical to the launch of WIOA in July but that ultimately will impact performance. After its next meeting the Work Group will reconvene as regulations, TEGLS, or policies become available to provide input and make recommendations for implementation strategies relating to the WIOA performance and negotiated performance effective July 1, 2015.

**WIOA: Performance Accountability and Data Collection: Full
Work Group
Meeting Notes**

WorkOne North
9002 Purdue Rd Ste. 200 Indianapolis

Present: Nina Babich and Mark Hollman – Key Transition Staff /DWD;
Tasha Johnson, DWD; Krystal Levi, Region 2; Kent Snyder, Region 2; Randy Frey,
DWD; Vickie Smith, DWD; Olgo Voloknova, DWD; Laura Phillips, DWD; Bill Miller,
EmployIndy; Melissa Leaming, Eastern Region; Debbie Gibson, DWD; Rick Lindsey,
Expert Consultant; Chris Deaton, DWD; Sue Zaring, National Able; Allison Leeuw,
DWD; Lara Pastora, Adult Education; Nancy Karazsia, DWD;
Miche Grant, Region 1/Facilitator

I. Review Preliminary Findings and Recommendations

First, each group had an opportunity to give an overview, their key findings, suggestions, and action to be taken.

See revised overview, actions, and recommendations where I have incorporated majority of our updated conversations and comments. _mg

Key Action Items:

Policy and Definitions - No new action items as result of this meeting

Data Collection, Validation, and Reporting (Nina encouraged) A matrix be created that show key point(s) of validation across all Core Partners. The matrix would depict data validation points that Core Partners have in common as well as those unique to one Core Partner if there are unique data that is validated. The matrix would identify the element, Core Partner(s) it pertains to, a very brief definition, and validation requirement. Miche will talk with Anita when she sees her at the upcoming MIS User Forum to explain.

II. Topics of Importance to multiple Work groups - below are the list of items or issues that we believe are being worked on within other Work Groups.

Due to overlapping work, groups working on the same concept or key issues were facilitated for the sake of efficiency.

Policy/Definitions

- What makes someone active in performance

- Eligibility
- Defining services

Data Collection/Wage Records/Validation/Reporting

- What makes someone active in performance
- Determine poverty areas
- Eligibility
- Testing and evaluating the impact of median wage by running ‘conceptual models’ using data (2 yrs) back
- Correlation/wage records
- Service structure (elimination)

Negotiation/Performance

- Correlation/wage records

Performance Accountability

- What makes someone active in performance
- Workflow
- Informational vs. data validation definitions

Adult Basic Education

- Will decisions affect Vocational Rehabilitation
- Need Structure

Youth

- Eligibility
- Population
- Basic skill deficient
- Testing process/TABE
- New Services

Adult/Dislocated

- Basic skills deficient
- Testing process/TABE, is it operations, flow or policy?

Ops

- Provide guidance to customer/work flow

Specs

- When Are Applications Required

Fiscal

- Pay for performance

Applications

- What participants will required an application

When are applications needed? This may differ between Core Partners and is being looked at by Flow and Policy as well as our interest in Performance.

III. Review the ongoing structure and sub work group activities

Do we keep structure the same or collapse?

We felt outside of the sub group on Review the Entire Act and likely the Pay for Performance most sub workgroups do have additional work. Most will take a short month on hiatus but keep in casual contact to make sure we are ready to reconvene. The sub-workgroup leads will continue as leads unless/until Miche is notified. Same with the make-up of the sub workgroups although if individuals want to shift, or drop, again you have only to let Miche know. We hope all members will see fit to keep the momentum of this Work Group going.

IV. Next Steps for Work Group Responsibilities

Next full in person team meeting was scheduled for April 7, 2015 at the same lthough we have not cancelled this group meeting, nor the room, it is unlikely that an in person meeting will take place in April. I would like to recommend we keep this as a conference call for at least sub group leads but will abide by the wishes of the group.

Performance Accountability and Negotiating Performance

Recommendations after Phase 1 (March 2015)

MEMBERS: Dawn Axsom, Chair; Donni Barnes, Jennifer Biddle, Jenny Brown Region 9, Chris Deaton, Randy Frey, Debbie Gibson, Tasha Johnson, Nancy Karazsia, Theresa Koleszar, Melissa Leaming, Allison Leeuw, Krystal Levi, Rick Lindsey, Bill Miller, Anita McNallin, Edmond O'Neal, Lara Pastore, Laura Phillips, Jeff Russell, Vickie Smith, Deb Waymire, Sue Zaring, Miche Grant Co-chair

Background:

A full in-person gathering was held in January whereby sub work groups were defined and individuals chose one or more sub work groups to participate. Sub work groups held independent conference calls and discussions that lead to recommendations back to the full Work Group and considered at their March 2015 in-person meeting. The Performance Accountability and Negotiating Performance Work Group initially divided into 7 sub work groups. From this two, Review the Act and Review the Regulations, had very specific tasks intended to support the work of the overall Work Group and therefore offer no recommendations to the transition team. The Data Validation sub work group after an initial meeting elected to merge with the Data Collection, Reporting, and use of Wage Records sub work group. Below are the 'topical' recommendations we present at this time.

We recommend continuation of this Work Group when regulations are dispersed and as program implementation begins. The Work Group believes guidance and recommendations being developed within several of the other Work Groups may need a secondary review by the Performance Accountability Work Group to ensure that service decisions while well founded do not adversely impact performance in the future.

Policy and Definitions (pertaining to performance accountability)

DWD Policies and Technical Assistance Bulletins (TAB) pertaining to performance accountability for review and update or revision:

2013-04	Adult Education Data Collection and Reporting
2012-07	Eligibility and data validation policy for Indiana's Workforce Investment System
2012-06	Qualifying credentials for the "Attainment of a Degree Certificate"
2010-13	Common Measures for the WIA Youth services
2009-13	Customer Flow Policy
2008-34	Training Provider Eligibility and Establishment of the Eligible Training Provider List under WIA
	DWD Grant Recipient Requirements; Non-Compliance remedies;
	WIA required incentives; and DWD Oversight Responsibilities

TAB

2012-04	Credentials for youth
2009-04	Guidance on 2009-13
2007-13	Indiana Performance Accountability System Changes
2006-007 change 1	Clarification - guidance from DOL - certifications and follow up
2005-003	High School Diplomas for Individuals with Disabilities

Data Collection/Reporting, use of Wage Records, and Data Validation

- A. Identify any additional programs within each of the Core Programs for which data is being collected:
 - Wagner-Peyser
 - Vocational Rehabilitation
 - Adult Education
 - Other State/Federal Programs
- B. Review of current policies within the Core Programs to begin identifying overlapping definitions and any eligibility and/or data validation requirements:
- C. Identify and begin training on data collection requirements under WIOA now based on current information available
- D. A matrix will be developed that depicts all Core Partner Validation points and key methods of validation to determine where there are cross-partner alignment.

Performance and Negotiating Performance makes the following suggestions

- A. Regarding the NASWA WIOA document titled "*Recommendations to USDOL on Implementation of the Performance Accountability Provisions of WIOA*" we make the following comments, suggestions, and recommendations.

Overall we felt that the recommendations in this document were in line with criteria we could support. We **recommend** the document be reviewed and much of it taken into consideration when drafting state level guidance.

We do offer several exceptions to the recommendations set for by NASWA:

First was the proposed change from 90 days without service to a very short 30 days. It is common for a customer to be away from services for legitimate reasons for 30 days, thus work group census was 30 days without service is too short.

Second, we discussed their suggestion that 'enrollment' would happen if an individual sought 'Informational' or 'Employment Connection' services three out of four weeks, including electronic connection. Here the group does not believe this a proper stand-alone determination for 'program enrollment'. We **recommend** if using a 'days of service' or 'number of system contacts' approach strong consideration be given to the

type of service, the level of service, and the individual's intent for services (particularly if tracking by service type)

One commenter talked about how NASWA addressed follow up services and its relationship to a POP as a good move.

Lastly in reference to the relationship between Unemployment Insurance and program participation and enrollment on Page 4 bullet #3 the we **recommend** strong consideration be given to *not* using Unemployment Insurance recipient as an automatic enrollment or count for performance. We do **recommend** that UI claimants be considered as part of the participant pool based on other characteristics in addition to their UI status. This means using UI claimant as an automatic enrollment into WIOA/WP program is **not recommended** by the Work Group.

B. Regarding the regression **model for performance** the Work Group provides the following comments and suggestions. *Please note:* the group reviewing and contemplating these new models had a number of local and state participants who have experience using similar models.

First, being mindful of the following concerns when recommendations are being made:
a) Incorporating the issue of lagging data and our inability to have standards or weights based on current statistics. b) Using cohorts from a long time back could make it difficult to achieve results in the present. c) models that reward strong performing regions by holding them accountable to higher standards and lower performing regions lower standards serves as a disincentive encouraging a high performing region to reduced effort.

Thus it is **recommended** a series of tests be run whereby new hire wages be supplemented for baseline data as opposed to using cohorts from wage reports that tend to be much more historical or data from a longer look-back.

We also **recommend** the following issues be taken into careful consideration before performance negotiation approaches are developed: a) clearly evaluate and test in advance both statewide vs. regionally based baselines. b) careful consideration be given to and tests run based on both models driven by mix of customer being serviced (at entrance) vs. the mix of characteristics based only on those who exit. c) evaluate the effect of barriers or characteristics used to adjust performance benchmarks up or down on a statewide statistics vs. negotiating them based on the unique make up of each region. (for example mix of specific demographics if taken on a statewide basis could prove inequitable)

We have temporarily tabled any major recommendations on Median Wage. Research by this Work Group did not locate any valid 'regional level' data for Median Wage. Although state level data or county / community level data was available. We encourage a more detailed analysis and test runs before deciding if the median earnings baseline will relate to all workers vs. median earnings based only on the mix of individuals being

served in the program. The Work Group **recommends** median earnings should be by county and then by region and not a statewide aggregate figure.

- C. Much Discussion was held on co-enrollment and subsequent performance across core programs. If automatic co-enrollment between Adult Education Students and WIOA-WP programs is mandated we **recommend** only HSE COMPLETERS or ABE High become part of the performance pool the primary target group for automatic co-enrollment). We need more evaluation on how groups such as Adult Education students should be factored into a statistically adjusted model.

Pay for Performance recommends Although ‘pay for performance’ is not mandatory the following suggestions are made in the event the state elects to implement. The Sub Workgroup **recommends** that this area be closely coordinated with the Fiscal Work Group so policies and decisions are fully aligned with compliance requirements.

- A. There should be additional opportunities for more discussion and evaluation on ways to meet the 10% mandate.
- B. Consideration should be given, if allowable by regulations or Federal policy, to excluding Youth and other long-term training participants from this calculation. A question posed here is does it have to cross all programs when we are moving into the new partner paradigm?
- C. The issue should be determined and negotiated at the regional level with Workforce Board input and in conjunction with all regional partners
- D. A strong communication plan is key at the local level to ensure the sharing of all short-term training programs being offered in the region with all partners to help ease their strain of trying to meet the 70-30% split pay for performance measures.

General Recommendation

There is a critical need to establish early on communications and protocols that will support the cross-informing between Core Programs. Currently our respective databases are not set up for data sharing so we recommend that not only should definitions be created in a way that are common across core partners, but also processes established and signed off by Core Partners at the state level to allow for universal sharing of data.

Performance Accountability and Data Validation

Work Group Update May 2015

Miche Grant and Dawn Axsom Co-leads

The Performance Accountability and Data Validation Work Group have not met since the last report-in session. Although for many in this group the past month has been busy reviewing, analyzing, and assisting in providing feedback and researching issues that lacked clarity. Below are some of the areas members in this work group have assisted in research and drafting definitions. As noted many of these have been resolved by state and federal information.

Policy/Definitions

- What makes someone active in performance
- Eligibility
- Defining services

Data Collection/Wage Records/Validation/Reporting

- What makes someone active in performance (validation)
- Determine high poverty areas
- Eligibility Verification
- Testing and evaluating the impact of median wage by running 'conceptual models' using data (2 yrs.) back – **Did not complete this task although did solid analysis**
- Correlation/wage records
- Points of Data Collection in the new service structure

Negotiation/Performance

- Correlation/wage records

Performance Accountability

- Informational vs. data validation definitions

Adult Basic Education

- The Impact of Adult Basic Education on Vocational Rehabilitation
- Changes in structure to accommodate new data collection

Youth

- Eligibility
- Defining Needs Additional Assistance
- Defining Basic Skill Deficient
- Testing process will it be TABE or other assessments
- New Services and new Elements how to track
- Counting Credentials during follow up

Adult/Dislocated

- Basic skills deficient needs definition
- Testing process, again what instrument(s) and will this be based on operational decisions, flow, or grounded in state policy?

Applications

- What participants will this required a full application

Members continue to make themselves available as content experts during the development of policy. This group will continue in past the July 1 WIOA launch because we believe there will be additional need for us to work on topics relating to performance and data validation.

Our next meeting is a conference call schedule for 10 AM – 11:30 AM May 12, 2015.