

# Oklahoma Employment Security Commission



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## Oklahoma Employment and Training Issuance # 01-2007

**TO:** Chairpersons of Local Workforce Investment Boards  
Chief Local Elected Officials  
WIA Board Staff  
Director, Workforce Quality  
Director, Workforce Services  
Director, Veteran Services

**FROM:** Richard Gilbertson, Director  
Workforce Integrated Programs

**DATE:** May 15, 2007

**SUBJECT:** State Guidance relevant to the Implementation of U.S. Department of Labor / Employment and Training Administration's (USDOL/ETA's) Common Measures Policy for Adult Programs.

**PURPOSE:** To update policy regarding Common Measure implementation and Service Integration in the State of Oklahoma. Guidance providing revised policy on common measures for the Employment and Training Administration (ETA) programs, Veterans' Employment and Training Services (VETS) workforce programs for the Workforce Investment Act (WIA), Wagner-Peyser (WP), and Trade Adjustment Assistance (TAA) programs in response to the Federal Register Notice published on July 13, 2005.

- Modifies and broadens the common measures definition of "participant" to include any individual who has been determined eligible and has received a program funded service either at a physical location or remotely via electronic technologies.
- Provides additional guidance to clarify the point when performance participation commences and terminates.
- Modifies the methodology for calculating the Adult Earnings measure by removing the use of pre-program earnings in the calculation and, instead, focusing on the average earnings achieved over a 6-month period following performance participation for those retained in employment.
- Clarifies when participants are counted and when they are excluded from performance. This OETI distinguishes self-service and information activities that are staff-assisted from other staff-assisted services.

**REFERENCE:** Training and Guidance Letter (TEGL) No. 17-05, “Common Measures Policy for the Employment and Administration’s Performance Accountability System and Related Performance Issues.” **Note that this issuance rescinds OETI 04-2006 Change 1, dated July 25, 2006.**

**BACKGROUND:** On February 17, 2006, USDOL/ETA issued a revised Common Measures Policy per Training and Employment Guidance Letter (TEGL) No. 17-05, “Common Measures Policy for the Employment and Training Administrations’ Performance Accountability System and Related Performance Issues.” This guidance replaced earlier issuances with a single, unified USDOL guidance document on the common measures policy for ETA and Veterans’ Employment and Training Service (VETS) workforce programs and clarified reporting requirements for the WIA, Wagner-Peyser Act, Veterans’ Employment and Training Service, and Trade Adjustment Assistance programs and WIA Section 136 performance accountability system.

Oklahoma believes this alignment of services is both an opportunity and a tool to effectively organize staff and facilities in a manner that further streamlines customer service delivery, capitalizes on the strengths of staff, location, and technology capabilities. All these efforts will reduce duplication, save diminishing resources, increase customer satisfaction, and better develop our valued service delivery professionals. Alignment of services and common measure definitions will more accurately reflect to Congress, stakeholders, the public, and other interested parties on how the public workforce investment system is meeting the needs of business and the workforce and contributing to economic growth. Oklahoma will emphasize streamlined service delivery to the customer. In doing so, each local area must review their current service delivery procedures, identifying the “who, what, when, where, and how” of their current service delivery model, and reshape it to achieve even greater efficiency and added value to our customers. Ways to ensure functional alignment of services may include: common intake forms, single points of contact, and services delivered according to customer need rather than program focus.

**POLICY OBJECTIVES:** Oklahoma’s vision for “Integrated Services” is based upon the policy objectives of TEGL 17-05, page 3:

“Common measures are an integral part of ETA’s performance accountability system. The value of implementing common measures is the ability to describe in a similar manner the core purposes of the workforce system: how many people found jobs; did they stay employed; and what did they earn. Multiple sets of performance measures have burdened states and grantees, as they are required to report performance outcomes based on varying definitions and methodologies. By minimizing the different reporting and performance requirements, common performance measures can facilitate the integration of service delivery, reduce barriers to cooperation among programs, and enhance the ability to assess the effectiveness and impact of the workforce investment system.

The workforce investment system is transforming into a demand-driven system with strategic investments in workforce solutions that result in more individuals being trained for highly skilled jobs in high-growth, high-demand industries. The performance accountability system, with common measures at its core, needs to be aligned with the specific demand-driven strategies identified at both the state and local levels. Demand-driven strategies may require unique approaches to training and service delivery. For example, depending on the specific skills and credentials identified as necessary by industry, training may be shorter and targeted in some instances and longer term in others. In all

cases, the workforce investment system continues to focus on connecting employers with skilled workers, and connecting workers with good jobs, as reflected in the common performance measures. To minimize burden on states and local areas as ETA programs are reauthorized, ETA will work to ensure that the common measures are consistent with the statutory performance measures.”

**ACTION REQUIRED:** The following message and attachments offer specific guidance regarding statewide common measure implementation covering various governance, management, and system issues. Workforce Investment Board Staff are requested to widely distribute copies of this issuance to staff and partners within the Workforce Investment Area for immediate implementation.

**MESSAGE: Common Measures provides for two types of Participants:**

## **PARTICIPANT**

**Policy:** *Effective July 1, 2006*, any customer who reports to a Workforce Center or satellite and receives any service (including self-service or informational activities only) will be considered as being served, in whole or in part, by both WIA and Labor Exchange (LE). At a minimum, adult customers accessing *self-service or informational activities only* must be counted as Participants in the WIA Adult Program. Those accessing self-service or informational activities only count in performance for Labor Exchange.

- *Participant* – An individual who receives self-service or informational activities only.
- *Self-Service* – Occurs when participants serve themselves in accessing *workforce investment system information* and activities in either a physical location, such as a Workforce Center resource room or partner agency, or remotely via the use of electronic technologies. No staff assistance provided, other than general instruction on how to use/access the self-service tools.
- *Informational Activities* – May include both self-services and staff-assisted services that are designed to inform and educate a participant about the labor market and to enable a participant to identify his or her individual employment strengths, weaknesses, and the range of services appropriate for the individual. If staff provides a participant with readily available information that *does not* require an assessment by the staff member of the participant’s skills, education, or career objectives, the participant is a recipient of informational activities. This includes information such as labor market trends, the unemployment rate, information on businesses that are hiring or reducing their workforce, information on high-growth industries, and occupations that are in demand.

A participant is also a recipient of informational activities when a staff member provides the participant with information and instructions on how to access the variety of other services and tools available in the Workforce Center.

### **Scenarios**

The following scenarios could occur in the delivery of service and are presented to illustrate the concept of the level of staff involvement discussed above.

### Scenario 1

An individual comes into the Workforce Office believing that he can access all government services. He asks for information about the Motor Vehicle Administration. He is given the information and leaves.

*The person is not a participant. Although he was given information, it did not relate to the services provided by the Workforce Investment System.*

### Scenario 2

An individual has figured out how to access workforce investment system information from home. He thinks that he has found the job of his dreams on Oklahoma Job Link and applies on line (self referral/internet referral). The blind ad job order requirement instructs the staff person to forward the individual's resume to the employer. The client is not required to report to the Workforce Center for data validation/eligibility.

*This person is a Participant in both WIA Adult and Labor Exchange as he has used Oklahoma Job Link for a self referral/internet referral. He is enrolled in the Labor Exchange program only, but not in WIA Adult because the service he received did not occur in a physical location. The staff person documents in Client Notes in the Universal section on the Case Details page in Oklahoma Service Link that eligibility was not validated due to this being a self referral/internet referral.*

## **PERFORMANCE PARTICIPANT**

**Policy:** Oklahoma has defined all Staff Assisted Services as having “*significant*” staff involvement. Any assistance provided by staff in a physical location, except informational activities, is considered significant regardless of the length of time involved. Participants meeting eligibility/data validation requirements and receiving staff assisted services will be enrolled and included in performance calculations for the WIA Adult and the Labor Exchange programs. The participant's program enrollment date must equal the date of first staff assisted service for the WIA program. However, Labor Exchange performance calculations will include those individuals receiving only self-service or informational services. The labor exchange enrollment date may reflect self-service or informational service as the first service if provided prior to receipt of a staff assisted service.

Dislocated Worker, TAA and NEG enrollments will only occur after additional eligibility requirements are met, validated, and the individual receives a service provided by the program. The enrollment shall be entered manually with the enrollment date being equal to the date of first service provided by the program. Individuals younger than 18 years of age do not meet the eligibility requirements for the WIA Adult program and will not be counted as Performance Participants in that program. Individuals age 16 through 21 that are enrolled in a WIA Youth program are not required to be dual enrolled in any other program.

- *Performance Participant* – A Performance Participant is an individual who is determined eligible to participate, meets the data validation/eligibility requirements and receives a staff

assisted service at a physical location. All Performance Participants who receive any staff assisted service(s) and exit the program are included in performance measure calculations. However, Adult and Dislocated Worker program participants who only receive self-service or informational activities are excluded from performance calculations.

Oklahoma Service Link (OSL) will generate a program enrollment for Labor Exchange upon receipt and entry of any service into OSL. Upon receipt and entry into OSL of services beyond self-service or informational an enrollment into WIA Adult will generate if the system has determined eligibility for the program. Individuals receiving services beyond self-service or informational activities must present proof of age, selective service registration (if applicable) and eligibility to work per state policy. Enrollments for WIA Adult, NEG and TAA will occur only after additional eligibility criteria are documented and a staff assisted service is provide. These enrollments must be manually entered. Any participant calling a Workforce Center and requesting staff assistance with a job referral to a blind ad is required to report to the office and provided eligibility documentation as described in OETI 06-2006. At that point, individuals become Performance Participants in WIA Adult and Labor Exchange (LE) programs.

### **Scenarios**

The following scenarios could occur in the delivery of service and are presented to illustrate the concept of Performance Participation discussed above.

#### Scenario 1

An individual accesses job listings from his home computer and inputs his resume into Oklahoma Job Link.

*This person is a Participant in Labor Exchange and WIA, but is not a Performance Participant in WIA. This person is counted as a Performance Participant in Labor Exchange.*

#### Scenario 2

An individual goes to the Workforce Office asking about job openings in a specific line of work. The staff person reviews and updates the client's demographic information in Oklahoma Service Link, documents data validation/eligibility requirements and then proceeds to ask the person several questions about their work history and training to determine if they are qualified for the type of work they are seeking. The staff person then does an Initial Assessment and documents the Basic Employment Plan stating the individual is job ready and being referred for job search based on the assessment. The staff person then assists the individual to search for job openings in that specific line of work in Oklahoma Job Link or refers them to the Job Getting Unit if the center is integrated.

*This person is a Participant in both Labor Exchange and WIA. The staff member performed an assessment of the participant's work readiness and assisted the participant with their job search. This person is a Performance Participant in both Labor Exchange and WIA. The client is enrolled in both LE and WIA adult and the staff assisted service is entered into Oklahoma Service Link.*

### Scenario 3

A gentleman reviewing job openings from home finds a job on Oklahoma Job Link and applies on line. This is a self referral/internet referral to a blind ad job order. The job order requires that the gentleman come into the office to complete a job application therefore the staff person instructs the client to bring the necessary documentation to complete data validation or the referral cannot occur. Anytime a job order instructs a participant to report to the Workforce Center data/validation eligibility documentation is required. The client reports to the office with documentation and the referral is completed.

*This person is a Performance Participant in both Labor Exchange and WIA. The staff person reviews and updates the demographic screens, completes the data validation/eligibility notes and gives the client the job referral. The staff person then enters the job referral into Oklahoma Service Link and completes the enrollment into WIA and Labor Exchange making sure that the program enrollment dates match the date of the job referral.*

### **'DATE OF PERFORMANCE PARTICIPATION' AND 'DATE OF EXIT' AFTER ELIGIBILITY**

**Policy:** *Effective July 1, 2006, any individual who receives staff assisted services will be counted as a Performance Participant in WIA Adult and Labor Exchange and will share a common “date of participation” and a common “date of exit” for federal reporting.*

#### **Performance Participation Date**

- When the participant receives staff assisted services other than self service or informational services from WIA Adult and Labor Exchange, the earliest date of service will be used as the “date of performance participation” otherwise known as “the enrollment date” for reporting in *each* program. Staff completing the enrollments must assure that the client is eligible for the program and that the date of first service and enrollment date are the same.

#### **Performance Exit Date**

- When the participant receives services from multiple programs, the last or most recent date of service will be used as the common “date of exit” reported in each program. In other words, a Performance Participant cannot be exited from any program until there has been a period of 90 days without services from any of the programs – LE, WIA, DLW, TAA or VETS. The receipt of service under one program will extend date of exit for all programs.

OSL will track the common date of exit across all programs.

**Exceptions:** A Performance Participant shall not be considered exited if there is a gap in service of greater than 90 days but less than 180 days due to one of the following circumstances:

- A delay before the beginning of training;
- Health/medical condition or providing care for a family member with a health/medical condition; or
- Temporary move from the area that prevents the individual from participating in services, including National Guard or other related military service.

The gap must be related to one of the above circumstances and can last no longer than 180 days. A consecutive gap in service of up to 180 days following the initial 180 days may be entered if the gap is utilized to resolve the issues that prevented the participant from completing program services that lead to employment. **All gaps and the reason for the gap must be documented in detail in Oklahoma Service Link, including the participant's intention to return and complete the program services.**

**Exclusions from performance:** A Performance Participant, either at the time of exit or during the three-quarter measurement period following the exit quarter may be excluded from performance due to one of following situations:

- Institutionalized - The participant is residing in an institution or facility providing 24-hour support, such as a prison or hospital, and is expected to remain for at least 90 days. This does not apply to individuals with disabilities residing in institutions, nursing home, or other residential environments; youths participating in the Responsible Reintegration of Youthful Offenders program or individuals participating in the Prisoner Reentry Initiative.
- Health/Medical or family care – The participant is receiving medical care or providing care for a family member for a period of greater than 90 days. These situations must be such that prevent the participant from entry into unsubsidized employment or continued participation in the program.
- Deceased
- Reserve Forces Called to Active Duty – The participant is a member of the National Guard or a military reserve unit and is called to active duty for a period of greater than 90 days.
- Relocated to a Mandated Program – Youth participants only, the participant is in the foster care system or another mandated (residential or non-residential) program and has moved from the area as a result of that program. This does not include relocation to a Job Corps center.
- Invalid or Missing Social Security Number – Because common measures require the match of social security numbers with wage and administrative data in order to obtain outcome information, participants with invalid or missing social security numbers will be excluded. Participants who do not voluntarily disclose their social security number will also be excluded.

**All exclusions and the reason for the exclusion must be documented in detail in Oklahoma Service Link.**

# **COMMON PERFORMANCE MEASURES SPECIFICS**

## **ADULT MEASURES (WIA Adult, DLW, WP, TAA and VETS)**

### **Entered Employment**

#### Methodology:

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

The number of adult participants who are employed in the first quarter after the exit quarter divided by the number of adult participants who exit during the quarter.

#### Operational Parameters:

- Individuals who are employed at the date of participation are excluded from this measure (i.e., programs will not be held accountable for these individuals under this measure).
- Individuals who, although employed at the date of participation, have either received a notice of termination of employment or whose employer has issued a Worker Adjustment and Retraining Notification (WARN) or other notice that the facility or enterprise will close, or who are transitioning service members are considered not employed at the date of participation and are included in the performance measure.
- Employment at the date of participation is based on information collected from the individual, not from wage records.

#### Discussion:

This measure provides an assessment of program impact in increasing employment for those who were not employed. ETA recognizes concerns related to the exclusion of individuals who are employed at the date of participation from this measure. However, including individuals with jobs at program entry is not fully consistent with the concept of an entered employment indicator. Positive impacts of services provided to incumbent workers and underemployed individuals can be demonstrated in both the retention and earnings measures.

### **Employment Retention**

#### Methodology:

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

The number of adult participants who are employed in both the second and third quarters after the exit quarter divided by the number of adult participants who exit during the quarter.

#### Operational Parameters:

- This measure includes only those who are employed in the first quarter after the exit quarter (regardless of their employment status at participation).

- Individuals who are not employed in the first quarter after the exit quarter are excluded from this measure (i.e., programs will not be held accountable for these individuals under this measure).
- Employment in the first, second, and third quarters after the exit quarter does not have to be with the same employer.

Discussion:

By defining a positive outcome as employment in the first, second, and third quarters after the quarter of exit, the measure approximates retention for at least six months following participation in the program. However, a positive outcome on the retention measure does not necessarily indicate continuous employment with the same employer.

## Average Earnings

Methodology:

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

Total earnings in the second quarter plus total earnings in the third quarter after the exit quarter divided by the number of adult participants who exit during the quarter.

Operational Parameters:

- To ensure comparability of this measure on a national level, wage records will be the only data source for this measure. Acceptable wage record sources are a state's Unemployment Insurance wage records, federal employment wage records and military employment wage records.
- Individuals whose employment in either the first, second, or third quarters after the exit quarter was determined solely from supplementary sources, and not from wage records, are excluded from the measure.

Discussion:

ETA is implementing a new methodology for calculating the average earnings measure for Program Year (PY) 2006. A number of states have expressed concern about the existing methodology for the earnings measure as previously defined, citing it as a disincentive to serving people with previous work experience, especially those with higher wages. The earlier definition focused on a comparison of pre-program and post-program earnings; the outcomes reflected more of the previous earnings history of the people served rather than the program's intervention. This limited its usefulness as a measure of a program's performance.

In response, the revised adult earnings measure looks at wages over six months of those exiters who are working in the 1<sup>st</sup>, 2<sup>nd</sup>, and 3<sup>rd</sup> quarters after exit. ETA believes this earnings measure is more straightforward than the previous approach, and the results will be easier to understand and explain to stakeholders than measures that compare the percentages or rates of pre-program and post-program earnings or changes in post-program earnings. By excluding the pre-program measurement point, agencies can develop more realistic and meaningful targets for the earnings measure, since programs do not have control over the pre-program earnings of the individuals they serve.

ETA will continue to collect the pre-program earnings, as well as other information on participants, and supplement this measure with data on earnings increase when describing program outcomes.

<b>Performance Measures</b>	<b>Program</b>
Entered Employment	WP/WIA/TAA & VETS
Employment Retention	WP/WIA/TAA & VETS
Average Earnings	WP/WIA/TAA & VETS

**INQUIRES:** If you have questions pertaining to this issuance, please contact either Robyn Coman at (405) 557-5318, [robyn.coman@oesc.state.ok.us](mailto:robyn.coman@oesc.state.ok.us); or Jon Eller at (405) 557-7149, [jon.eller@oesc.state.ok.us](mailto:jon.eller@oesc.state.ok.us).

**ATTACHMENTS:**

**Attachment A** – Key Definitions of Services

**Attachment B** – List of Services, Durations and OSL Entry Requirements