

Oklahoma Employment Security Commission



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Oklahoma Employment and Training Issuance # 17-2009

TO: WIA Board Staff
LO Managers

FROM: Richard Gilbertson, Director
Workforce Integrated Programs

DATE: June 24, 2009

SUBJECT: State guidance relevant to the implementation of the U. S. Department of Labor/Employment and Training Administrations (USDOL/ETA) Common Measures Policy for the WIA Youth Program.

PURPOSE: To communicate Oklahoma's revised policy for the United States Department of Labor, Employment and Training Administration's Common Measures for the WIA Youth Program. Guidance ensuring that youth service definitions and Oklahoma Service Link (OSL) data entry requirements are standard statewide.

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." TEGL 17-05, Change 2, Guidance on the Literacy Numeracy Measure for the Youth Programs. Workforce Investment Act Title 1 B Standardized Record Data (WIASRD) layout. Educational Functioning Level (EFL) revised tables available at <http://www.nrsweb.org/pubs/>.

RESCISSIONS: This policy rescinds and replaces Oklahoma Employment and Training Issuance (OETI) 04-2006, Common Measures Policy.

BACKGROUND: In November 2006, the State of Oklahoma was granted a waiver of the 17 (15 core and two customer satisfaction) indicators of performance for employment and training activities authorized under Section 136(b) of the Workforce Investment Act; replacing them with the new common performance measures articulated by the U.S. Department of Labor in TEGL 17-05. Under this waiver Oklahoma went from reporting 7 performance measures for Older and Younger Youth to measuring and reporting only 3 outcomes for a combined pool of youth ages 14 through 21. The waiver also eliminated the concept of Younger Youth and Older Youth and put direct emphasis on In-School and Out-of-School Youth. By accurately capturing and reporting the data elements pertaining to the Youth Common Measures, Oklahoma meets the requirements outlined in Section 136 of the Workforce Investment Act.

COMMON MEASURES FOR YOUTH

1. Placement in Employment or Education

Methodology:

Of those who are not in post-secondary education or employment (including the military) at the date of participation:

The number of youth participants who are in employment (including the military) or enrolled in post-secondary education and/or advanced training/occupational skills training in the first quarter after the exit quarter divided by the number of youth participants who exit during the quarter.

Operational Parameters

Individuals who are in post-secondary education or employment at the date of participation are excluded from this measure (i.e., programs will not be held accountable for these individuals under this measure).

In Post-Secondary Education at the Date of Participation (Excluded) – An individual who is currently enrolled in and attending a program at an accredited degree-granting institution that leads to an academic degree (e.g., A.A., A.S., B.A., B.S.). Programs offered by degree-granting institutions that do not lead to an academic degree (e.g., certificate programs) do not count as post-secondary education.

Employed at the Date of Participation (Excluded) – An individual employed at the date of participation is one who:

- Did any work at all as a paid employee on the date participation occurs (except the individual is not considered employed if: a) he/she has received a notice of termination of employment or the employer has issued a Worker Adjustment and Retraining Notification (WARN) or other notice that the facility or enterprise will close, or b) he/she is a transitioning service member;
- Did any work at all in his/her own business, profession, or farm;
- Worked 15 hours or more as an unpaid worker in an enterprise operated by a member of the family; or
- Was not working, but has a job or business from which he/she was temporarily absent because of illness, bad weather, vacation, labor-management dispute, or personal reasons, regardless of whether paid by the employer for time off, and regardless of whether seeking another job.

Employment and education status at the date of participation are based on information collected from the individual and documented in the Oklahoma Service Link (OSL) demographic screen during the eligibility determination.

Individuals in secondary school at exit will be included in this measure.

Discussion

Participants who enter the youth program while already in postsecondary education, employment, or the military have achieved the desired outcome under this measure. Therefore, these individuals are excluded from this measure. Successfully returning young people to school or alternative education is desirable, but secondary school enrollment does not qualify as a placement under this measure. Individuals in secondary school at exit are included in this measure. This is consistent with U.S. DOL/ETA's vision to ensure youth successfully complete their secondary education, which will ultimately lead to better long-term success in the workforce.

Placement in Employment (positive outcome) - To ensure comparability of the common measures on a national level, wage records are the primary data source for the employment-related measures. **OSL automatically captures quarterly wage records for individuals employed after program exit.** Staff may use supplemental sources of data to document the youth's entry in employment for those participants not covered by wage records. Supplemental wages should not be entered until the staff person is sure that wage records do not exist. Allowable sources of supplemental information for tracking employment include detailed case notes, documented surveys of participants, and contact with employers.. All supplemental data and methods must be documented and are subject to monitoring and data validation.

Placement in Education (positive outcome) - **Placement in post-secondary and/or advanced training/occupational skills training must be documented in OSL's Program Details page using the "Outcomes" link.** Placement in education is not automatically captured and must be documented by staff after the participant exits the program. The following data sources can be used to determine whether participants in youth programs are placed in post-secondary education and/or advanced training/occupational skills training:

Case management notes and surveys of participants to determine if the individual has been placed in post-secondary education and/or advanced training/occupational skills training; or

Information that the participant has been placed in post-secondary education and/or advanced training/occupational skills training may be obtained from the following sources and documented in the OSL "Outcomes".

- State boards governing community colleges;
- State boards governing universities;
- State education associations;
- Integrated post-secondary or higher education reporting units; and/or
- Training institutions/providers.

2. Attainment of a Degree or Certificate

Methodology:

Of those enrolled in education (at the date of participation or at any point during the program):

The number of youth participants who attain a diploma, GED, or certificate by the end of the third quarter after the exit quarter divided by the number of youth participants who exit during the quarter.

Operational Parameters:

Individuals not enrolled in education at the date of participation or at any time during the enrollment excluded from this measure. *Individuals in secondary school at exit will be included in this measure.*

Enrolled in Education - refers to participation in secondary school, post-secondary school, adult education programs, or any other organized program of study such as advanced training/occupational skills training that leads to a degree or certificate.

- Adult Education Program – Training that will enable an individual to increase basic literacy skills or attain a General Equivalency Diploma (GED).
- Secondary School – Course work leading to a high school diploma.
- Post-Secondary School– an accredited degree-granting institution that leads to an academic degree (e.g., A.A., A.S., B.A., B.S.) upon completion of a planned course of study.
- Advanced Training/Occupational Skills Training - An organized program of study that provides specific vocational skills that lead to proficiency in performing actual tasks and technical functions required by certain occupational fields at entry, intermediate, or advanced levels and result in attainment of a certificate

Diploma/Degree - means any credential that the state education agency accepts as equivalent to a high school diploma. This OETI clarifies that the term diploma also includes post-secondary degrees including Associate's Degrees (AA and AS) and Bachelor's Degrees (BA and BS). Diplomas, GEDs, or certificates can be obtained while a person is still receiving services or at any point by the end of the third quarter after the exit quarter. **This information must be documented in the OSL program “Outcomes” screen.**

Certificate – A certificate is awarded in recognition of an individual’s attainment of measurable technical or occupational skills necessary to gain employment or advance within an occupation. These technical or occupational skills are based on standards developed or endorsed by employers. Certificates awarded by workforce investment boards are not included in this definition. Work readiness certificates are not included in this definition. A certificate is awarded in recognition of an individual’s attainment of technical or occupational skills by:

- A state educational agency or a state agency responsible for administering vocational and technical education within a state.

- An institution of higher education described in Section 102 of the Higher Education Act (20 USC 1002) that is qualified to participate in the student financial assistance programs authorized by Title IV of that Act. This includes community colleges, proprietary schools, and all other institutions of higher education that are eligible to participate in federal student financial aid programs.
- A professional, industry, or employer organization (e.g., National Institute for Automotive Service Excellence certification, National Institute for Metalworking Skills, Inc., Machining Level I credential) or a product manufacturer or developer (e.g., Microsoft Certified Database Administrator, Certified Novell Engineer, Sun Certified Java Programmer) using a valid and reliable assessment of an individual's knowledge, skills, and abilities.
- A registered apprenticeship program.
- A public regulatory agency, upon an individual's fulfillment of educational, work experience, or skill requirements that are legally necessary for an individual to use an occupational or professional title or to practice an occupation or profession (e.g., FAA aviation mechanic certification, state certified asbestos inspector).
- A program that has been approved by the Department of Veterans Affairs to offer education benefits to veterans and other eligible persons.
- Job Corps centers that issue certificates.
- Institutions of higher education which is formally controlled, or has been formally sanctioned, or chartered, by the governing body of an Indian tribe or tribes.

Case management notes and surveys of participants to determine if the individual has received a degree or certificate; or Record sharing agreements and automated record matching with administrative/other data sources to determine and document that the participant has received a degree or certificate. These data sources may include:

- State boards of education;
- State boards governing community colleges;
- State boards governing universities;
- State licensing boards for private schools;
- State education associations;
- Integrated post-secondary or higher education reporting units;
- State Department of Professional or Occupational Regulation (possibly other units such as health care administration or specific boards like the "Board of Nursing");
- Professional, industry, or employer organizations or product manufacturers or developers;
- Training institutions/providers; and/or
- Adult Basic Education providers (GED/equivalent testing agencies).

The Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. Section 1232g; See the Act's regulations at 34 CFR Part 99) is a Federal law that protects the privacy of student education records. The law applies to all schools that receive U.S. Department of Education funds and may restrict access to a participant's education outcome information. Contact the Department of Education at (202) 260-3887 (voice), or visit the ED.gov Web site at <http://www.ed.gov/policy/gen/guid/fpc/ferpa/index.html> for further assistance.

Discussion

Individuals in secondary school at exit are included in this measure. This is consistent with U.S. DOL/ETA's vision to ensure youth successfully complete their secondary education, which will ultimately lead to better long-term success in the workforce.

Work readiness certificates will not be accepted under this measure.

U.S. DOL/ETA recognizes that work readiness skills are a valued skill set that will lead to successful employment and retention and encourages programs to continue to provide work readiness skills. However, the focus of the certificate measure is attainment of measurable technical or occupational skills, rather than work readiness skills. Although there are currently work readiness certificates developed or in development, these certificates focus primarily on basic skills, which are covered under the literacy/numeracy measure. It would be duplicative to include the attainment of basic skills under this measure.

3. Literacy and Numeracy Gains

Methodology:

Of those out-of-school youth who are basic skills deficient:

The number of youth participants who increase one or more educational functioning levels divided by the number of participants who have completed a year in the youth program (i.e., one year from the date of first youth program service) plus the number of participants who exit before completing a year in the youth program.

The measure includes individuals who are given an initial assessment but, either: (1) do not post-test before exiting the program, or (2) exit before completing a year in the youth program (i.e., one year from the date of first youth program service).

Operational Parameters

Out-of School Youth –An eligible youth who is a school dropout, or who has received a secondary school diploma or its equivalent but, *is basic skills deficient, unemployed, or underemployed (WIA section 101(33))*. For reporting purposes, this term includes all youth except: (i) those who are attending any school and have not received a secondary school diploma or its recognized equivalent, or (ii) those who are attending post-secondary school and are not basic skills deficient.

For example:

- A youth who is a high school dropout. *This is always an out-of-school youth.*
- A youth who is a high school graduate (attained diploma or equivalent), but is basic skills deficient or unemployed or underemployed. (*Unemployed or underemployed does not apply to those attending post secondary education.*)
- A youth who is a high school graduate (attained diploma or equivalent), attending post-secondary education (college) and is basic skills deficient. *A high school graduate, attending college must be basic skills deficient to be classified as an out-of-school youth.*

In-School Youth – (i) those who are attending any school (defined as an individual attending any High School program seeking a High School diploma) and have not received a secondary school diploma, or, (ii) those who are attending postsecondary school and *are not basic skills deficient*. In-school youth are excluded from this measure.

Basic Skills Deficient – The individual computes or solves problems, reads, writes, or speaks English at or below the eighth grade level or is unable to compute or solve problems, read, write, or speak English at a level necessary to function on the job, in the individual’s family, or in society. In addition, states and grantees have the option of establishing their own definition, which must include the above language. In cases where states or grantees establish such a definition, that definition will be used for basic skills determination. Individuals who are determined not to be basic skills deficient based on pre-test results are excluded from this measure (i.e., programs will not be held accountable for these individuals under this measure).

Pre-Test - It is allowable to use pre-tests that are administered up to six months prior to the date of first WIA youth service, if such pre-test scores are available. If prior pre-tests are not available, administration of the pretest must occur within 60 days following the date of first youth program service. **The pre-test must be documented in the OSL program enrollment “Out-of-School Testing” screen.** This measure is based on "date of first youth program service" which is equal to the participation/enrollment date. A pre-test may be given up to 6 months prior to the participation/enrollment date but the measure is still based on the date of the first youth program service.

Post-Test - To be included in the numerator, a participant must demonstrate on a post-test that she/he has advanced one or more educational functioning levels beyond the level in which she/he was initially placed at pre-test within one year (365 days) from the date of first youth program service. **The post test must be documented in the OSL program enrollment “Out-of-School Testing” screen.** (Note: the one-year time period is from date of first youth program service, not date of pre-test.)

Testing Individuals With Disabilities - individuals with disabilities (as defined in 29 CFR Part 37.4) should be accommodated according to: (1) Section 188 of WIA: 29 CFR Part 37, Section 504 of the Rehabilitation Act of 1973, and Title H of the Americans with Disabilities Act, (2) guidelines associated with the assessment tool used to determine functioning levels, or (3) state law or policies.

When administering assessment tools, individuals with disabilities are to be provided with reasonable accommodations, as appropriate, according to:

- Section 188 of the WIA (implementing regulations at 29 CFR Part 37), Section 504 of the Rehabilitation Act of 1973 (DOL implementing regulations at 29 CFR Part 32), and Title II of the Americans with Disabilities Act, if applicable (implementing regulations at 28 CFR Part 35) taking into consideration;
- Guidelines associated with the assessment test; and
- State laws or policy.

Regulations implementing WIA Section 188, found at 29 CFR Part 37, provide a general definition of "reasonable accommodation" for individuals with disabilities. In essence, such accommodations are "modifications or adjustments," made on a case-by-case basis, "that enable a qualified individual with a disability . . . to receive aid, benefits, services, or training equal to that provided to qualified individuals without disabilities." (See 29 CFR Part 37.4, definition of "reasonable accommodation.") In the assessment context, accommodations are changes made to the materials or procedures used for the assessment in order to "level the playing field." This is to ensure that the assessment tool measures the individual's skills and abilities, and not his/her disabilities. Because youth with disabilities are expected to achieve the same gains as other youth, it is critically important that appropriate accommodations be provided for the assessment process, to ensure that the gains achieved by these youths can be determined accurately.

Accommodations for the assessment process generally fall into the following categories¹:

1. Changes to the methods of **Presentation** of the test used as an assessment tool: e.g., providing Braille versions of the test, or orally reading the directions or test questions to test-takers;
2. Changes to the methods of **Response** to the test questions: e.g., having the test-taker point to a response or use a computer for responding;
3. Changes to the **Setting** in which the test is provided: e.g., permitting the test to be taken at home, or in small groups, rather than in a large-group or institutional setting; and
4. Changes to the **Timing/Scheduling** of the test: e.g., extending the amount of time generally provided for completion of the test, permitting frequent breaks, etc.

The State fully expects that most youth with disabilities can and should be assessed using tests that specifically crosswalk to educational functioning levels, using accommodations where needed. The State also recognizes that in very limited instances, use of these testing

¹ Thurlow, M., House, A., Boys, C., Scott, D., & Ysseldyke, J. (2000). *State Participation and Accommodation Policies for Students with Disabilities: 1999 update* (Synthesis Report No. 33). Minneapolis, MN: University of Minnesota, National Center on Educational Outcomes. Retrieved on 04/01/2005 at the following Web site: <http://education.umn.edu/NCEO/OnlinePubs/Synthesis33.html>

instruments, even with appropriate accommodations, may not provide a valid or reliable evaluation of the literacy and numeracy skills of a youth with one or more disabilities. These instances may arise because of the nature or extent of a particular individual's disability, and/or because of limitations in the testing instruments themselves. In those rare instances, service providers and grant recipients may use alternate assessment tools to measure gains in numeracy and literacy for youth with disabilities, if those alternate tools have been deemed by the State to provide valid and reliable indicators of information that are comparable to the information provided through the educational functioning levels. Such alternate tools may include, but are not limited to:

- a. Portfolio assessments;
- b. One-on-one performance assessments; and
- c. Alternative standardized tests.

Each Workforce Investment Area should identify at least one alternative assessment tool that can be used in such situations. If such alternative assessment tools are used, the State will determine, based on the type of assessment, what constitutes a successful gain for the literacy/numeracy measure. It is advisable that youth professionals receive specific guidance and training in the administration of alternate assessments to youth with disabilities to ensure they have the necessary skills and knowledge to appropriately administer the tests and accurately interpret results.

Discussion

The literacy and numeracy gains indicator measures the increase in skills of participants through a common assessment tool administered at program entry and regular intervals thereafter. Youth participants for whom the goal of literacy and numeracy gains is most appropriate are those with basic skills deficiencies. Participants who are not basic skills deficient cannot achieve a positive outcome because they have attained basic literacy and numeracy. Exclusion of individuals who are not basic skills deficient focuses the measure on the participants with the greatest need for remediation, and minimizes the burden of testing individuals who, by virtue of their existing skill level, will not achieve a positive outcome under this measure.

In-school youth already undergo a number of assessments within the school system in order to comply with state standards of learning and, in many states, graduation exams. Requiring in-school youth to receive further academic assessments outside of the school system is redundant since it is the responsibility of local school districts to ensure proper academic assessment of in-school youth. Therefore, in-school youth are excluded from this measure.

Under a normal distribution of pre-test scores, most participants' scores will place the individuals in a range indicating they have completed some of the skills in that particular educational functioning level. Therefore, for a majority of participants, a positive outcome for this measure (i.e., completion of one educational functioning level and an increase to the next level) is not likely to require the equivalent of completing two grade levels, but will average to the equivalent of one grade level.

National Reporting System (NRS) - To maintain consistency with the implementation of the common measures by the Department of Education (ED), U.S. DOL/ETA has adopted policies for

the ED outcome measure of educational gain, as outlined in the NRS. The NRS was developed by the Department of Education's Division of Adult Education and Literacy for implementation of an accountability system for federally-funded adult education programs under WIA Title II.

Educational Functioning Levels - revised Educational Functioning Level (EFL) descriptors table from the Department of Education are available at: **Educational Functioning Level (EFL) revised tables available at <http://www.nrsweb.org/pubs/>**. Unless a previous assessment was conducted within six months prior to participation, programs must assess participants at intake or within 60 days following the date of first youth program service to determine their initial educational functioning level. As outlined in the NRS, there are two sets of educational functioning levels - six levels for Adult Basic Education (ABE) and six levels for English-as-a-Second Language (ESL) students. ABE levels roughly equate to two grade levels.

ABE/ESL - level describes a set of skills and competencies that students entering at that level demonstrate in the areas of reading, writing, numeracy, speaking, listening, functional, and workplace skills. These descriptors provide guidelines for placing participants in educational functioning levels, based on performance on standardized tests. After a participant has completed a uniform, standardized assessment procedure, programs use these descriptors to determine the appropriate initial ABE or ESL level in which to place students. If a participant is functioning at different levels in reading, writing, numeracy, speaking, listening, functional, and workplace areas, the individual is placed in different ABE and ESL levels across the functioning areas. In the post-test assessment, if the participant demonstrates an increase to the next functioning level in any of the areas - reading, writing, numeracy, speaking, listening, functional, and workplace areas - s/he has made an educational gain and should be included in the numerator. For example, an individual is placed in the Beginning Basic Education level (the second ABE level) in math and the Low Intermediate Basic Education level (the third ABE level) in reading at pre-testing. The individual achieves an educational gain if s/he places in either the third ABE level in math or the fourth ABE level in reading at post-testing.

Assessment Tool - To measure the increase in skills of individuals, programs must use an assessment procedure comprised of a standardized test or a performance assessment with standardized scoring protocols that crosswalk directly to the NRS educational functioning levels available at <http://www.nrsweb.org/pubs/>.

The Department of Education recently announced that the TABE CLAS-E assessment has been approved to test the literacy gains of English-as-a-Second-Language (ESL) students and approved the Wonderlic assessment for the following educational functioning levels: low intermediate, high intermediate and low adult. Additionally, the Department of Education has removed ABLE from its list of approved assessments.

All Workforce Investment Boards are not required to use the same assessment tool throughout the State. However, programs must adhere to the following in choosing an assessment tool:

- a. The same assessment tool is administered to the participant for pre-testing and post-testing;

- b. The assessment tool and its scores must crosswalk directly to the educational functioning levels so that educational gains can be reported in terms of increase in one or more ABE or ESL levels; and
- c. Tests must be administered in a standardized manner throughout the Workforce Investment Area (i.e., used consistently and reliably across programs and produce observable results).
- d. Tests must be administered to individuals with disabilities (as defined in 29 CFR 37.4) with reasonable accommodations, as appropriate (see additional guidance under *Testing Youth with Disabilities*).

The NRS provides test benchmarks for educational functioning levels. The benchmarks are provided as examples of how students functioning at each level would perform on the tests.

Testing Interval: Participants identified as basic skills deficient must be post-tested at least once by the end of year one following the individual's date of first youth program service.

- a. For participants who have completed one year following the date of first youth program service, if more than one assessment is administered after the initial test, the latest assessment within one year of first youth program service should be used to determine if the participant has demonstrated an increase in at least one educational functioning level.
- b. Individuals who remain basic skills deficient and continue to participate after completing a full year in the program, including pre-test and post-test, must continue to receive basic skills remediation services. These participants must be included in the measure for the first year of participation. They are not included again in the measure until they have completed a second full year in the program. At the completion of the second year, these participants must be included in the measure using the latest post-test score during the second year. To determine an increase of one or more levels, the participant's latest post-test score from the second year in the program must be compared to the score from the test that was administered at the latest point during the first year. If an individual remains basic skills deficient following the second year of the program, that individual must be included in the measure a third time if they complete a third full year in the program. This rule applies for the entire time that individual is in the program.

Attachment A provides a description of the participant cohorts for the literacy/numeracy measure for Program Years 2008, 2009, and 2010

POINT OF PROGRAM PARTICIPATION/ENROLLMENT FOR YOUTH

Following a determination of eligibility, participation begins when the youth receives a service. The date of participation has the same meaning as date of enrollment for youth and must match the date of first youth service. This date is established by a staff person entering the enrollment and subsequent service into OSL. The Date of Enrollment must equal the date of the first program service. The determination of eligibility includes the process of collecting information, documents, or signatures necessary for participation in the program. The determination of eligibility may also include any testing necessary to meet compliance with LWIB policy.

POINT OF FOLLOW-UP FOR YOUTH

Follow-up for youth is mandatory under the WIA and must be provided for a minimum of 12 months. The youth will not exit the program until 90 days after the receipt of the last youth service or partner program service therefore follow-up services for the youth program must begin the day after the last youth program service. The actual exit date may have no bearing on the start of follow-up services.

POINT OF EXIT FOR YOUTH

The term program exit means a participant has not received a service funded by the program or funded by a partner program for 90 consecutive calendar days, and is not scheduled for future services. **The exit date is the last date of service funded by the youth program or any partner program using OSL.**

Other Reasons for Exit (excludes youth from performance measures) - **A participant in any of the following categories, either at the time of exit or during the three-quarter measurement period following the exit quarter, may be excluded from common measures provided the situation is properly documented in OSL by answering the “Exit Questions” on the program details page and including a detailed program note explaining the circumstances. The “Exit Questions” in OSL do not appear until after the participant has exited. (*Youth participating in the ARRA Summer Employment Program can't be excluded from the work readiness measure for any reason*)**

- a. 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 in that institution for at least 90 days. This reason does not apply to individuals with disabilities (as defined in 29 CFR 37.4) residing in institutions, nursing homes, or other residential environments; individuals participating in the Responsible Reintegration of Youthful Offenders program and individuals participating in the Prisoner Reentry Initiative.
- b. Health/Medical or Family Care – The participant is receiving medical treatment or providing care for a family member with a health/medical condition that precludes entry into unsubsidized employment or continued participation in the program. This does not include temporary conditions or situations expected to last for less than 90 days.
- c. Deceased

- d. 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 at least 90 days.
- e. Relocated to a Mandated Program – The participant is in the foster care system or another mandated (residential or nonresidential) program and has moved from the area as part of such a program. This does not include relocation to a Job Corps center.
- f. Invalid or Missing Social Security Number – Because the measures require grantees to match personally identifiable client records with wage and other administrative data in order to obtain outcome information, grantees may exclude from all the measures those participants who do not voluntarily disclose a valid social security number.

Gap in Service - Occasionally, circumstances arise that are beyond the control of both the participant and staff and are expected to last for an undetermined period beyond 90 days. A participant should not be considered as exited if there is a gap in service of greater than 90 days due to one of the following circumstances: *(Youth participating in the ARRA Summer Employment Program can't utilize the gap in service to delay outcomes)*

A gap in service must be related to one of the three circumstances identified above and last no more than 180 consecutive calendar days from the date of the most recent service to allow time to address the barriers to continued participation. However, grantees may initiate a consecutive gap in service of up to an additional 180 days for the participant that follows the initial 180-day period to resolve the issues that prevent the participant from completing program services that lead to employment. **All gaps in service that occur and the reasons for the gaps in service—including the participant's intent to return to complete program services—MUST be documented in detail in OSL in the “Schedule a Service Gap” section of the participants program enrollment.**

ACTION REQUIRED: Workforce Investment Board Staff are requested to widely distribute copies of this issuance to staff. This is official state policy, and should be kept in your permanent policy issuance file.

INQUIRIES: If you have questions pertaining to this issuance, please contact Robyn Coman at (405) 557-5318, robyn.coman@oesc.state.ok.us; or Tami Decker at (405) 962-7595, tdecker@oesc.state.ok.us.

Attachment A: Literacy/ Numeracy Participant Cohort Table and Description

Attachment B: Key Definitions of OSL Services

Attachment C: List of Services, Durations and OSL Entry Requirements