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| TRAINING AND EMPLOYMENT NOTICE | NO. 8-10 |
| | DATE August 26, 2010 |

TO: STATE WORKFORCE AGENCIES
STATE WORKFORCE ADMINISTRATORS

FROM: JANE OATES /s/
Assistant Secretary

SUBJECT: Workforce Investment Act Self-Service Participant Reporting –
What, Where, and How

1. Purpose. This Training and Employment Notice (TEN) provides a framework for standardizing the collection and reporting of Workforce Investment Act (WIA) self-service only participant information. A more standardized approach will help ensure more consistent and comparable data on the numbers and characteristics of individuals who self-access workforce investment system information, and the activities primarily accessed through the use of electronic technologies and financially supported by both WIA and Wagner-Peyser Employment Service resources.

In general, this TEN clarifies self-service performance reporting policy by reiterating the existing definition and reporting instructions for WIA self-service only participants, examining how those instructions impact WIA performance data, and offering a “roadmap” for consistent reporting across the states and territories.

2. References.

- Workforce Investment Act (WIA) of 1998, as amended (29 U.S.C. 2801 et seq.)
- Wagner-Peyser Act, as amended (29 U.S.C. 49 et seq.)
- Training and Employment Guidance Letter (TEGL) No. 17-05, “Common Measures Policy for the Employment and Training Administration’s (ETA) Performance Accountability System and Related Performance Issues”
- Information Collection Forms ETA 406 Handbook, ETA 9002 and VETS 200 (OMB Control No. 1205-0240)
- Information Collection Forms ETA 9091, 9090, WIASRD (OMB Control No. 1205-0420)

- TEGL No. 17-09, “Quarterly Submission of Workforce Investment Act Standardized Record Data (WIASRD)”

3. Background. The reporting of self-service only participation has dramatically increased the number of WIA participants, especially in the WIA Adult program. However, the reporting has not been done consistently across states; several states report little to no WIA self-service only participants while others report many hundreds of thousands. There are considerable differences in how states identify and count self-service participants, causing significant variation in self-service participation counts that are unrelated to the supply and demand conditions for this type of service.

4. Definition of Self-Service. WIA self-service activities are defined in 20 CFR 666.140(a)(2) as core and informational services that are made accessible to the general public and that do not require significant staff involvement.

Significant staff involvement is defined in TEGL 17-05, “Common Measures Policy for the Employment and Training Administration’s Performance Accountability System and Related Performance Issues,” as assistance provided by staff beyond informational activities regardless of the length of time involved in providing the assistance. Significant staff involvement includes a staff member’s assessment of a participant’s skills, education, or career objectives in order to:

- Assist participants in deciding on appropriate next steps in the search for employment, training, and related services, including job referral;
- Assist participants in assessing their personal barriers to employment;
- Assist participants in accessing other related services necessary to enhance their employability and individual employment related needs.

If a staff member 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. Examples of informational activities include information on 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 high demand. When staff provide participants with information on how to access other services available in the One-Stop Career Center, this does **not** qualify as staff-assisted services.

By design, self-services are available to educate individuals about the labor market, their employment strengths and weaknesses, and the range of services appropriate to their particular situation. **Self-service only** participation occurs

when individuals serve themselves by accessing workforce investment system information and activities in either a physical location or remotely via the use of electronic technologies. The individual receives little or no staff assistance.

5. Self-Service Reporting Instructions. In accordance with section 136 of the WIA, self-service participants are to be excluded from the calculation of the WIA performance measures; however, it is important for states to report fully the number of individuals who access one or more services offered by the workforce investment system. In 2006, the Employment and Training Administration (ETA) recognized that states were dedicating a significant portion of their resources to provide core and informational services to individuals who accessed self-service activities, yet these individuals were not necessarily reflected in reported program participation. ETA's policy was revised to require state workforce agencies to report all individuals who receive services, including self-service only individuals, as participants in all relevant programs contributing funds to these services.

This policy for performance reporting was codified in section 6.A(2) of TEGL 17-05. Individuals who are age 18 or older and receive WIA-funded self-service only activities are to be counted as participants in the WIA Adult program. If self-service activities are funded by a mixture of Wagner-Peyser Employment Service and WIA funds, then these participants should also be reported under the Wagner-Peyser Employment Service, where they are subject only to the pertinent Wagner-Peyser Employment Service performance accountability measures. Program exit occurs when a participant has not received a service funded by the program or any partner program for 90 consecutive calendar days. As such, self-service activities would extend the period of participation.

6. A Roadmap to Standardize Self-Service Counts. States have described significant variation in the way self-service only participants were being funded and counted. For instance, some states report self-service participants only in the Wagner-Peyser Employment Service because their state has traditionally viewed this program as being responsible for providing information services, such as labor market information and that the Wagner-Peyser Employment Service is the source of funds for the provision of these services (websites and One-Stop Career Center resource rooms).

Of the states that report self-service only participants in both the WIA programs and the Wagner-Peyser Employment Service, how these individuals are identified also varies. Some states define and report on self-service only participants who access self-service information only in a physical location, such as a One-Stop Career Center. Other states have put in place an electronic registration system that tracks self-service only participation electronically, with

the majority of states being unable to distinguish the precise location of the provision of the self-services (i.e. whether the individuals went to a One-Stop Career Center resource room or obtained the information via a home or local library computer).

The multiple interpretations of the self-service reporting methodology has contributed to significant variation in what, where, and how self-service only participants are tracked and reported, regardless of economic or other relevant factors. As a result, aggregate (total) participant counts mean different things to different states and cross-state comparisons are unreliable or potentially misleading.

Standardizing self-service reporting is beneficial for performance reporting for at least a couple of reasons. First, a standardized count of self-service only participants would make state-by-state comparisons more meaningful. Second, a standardized process for reporting these participants would provide more consistent information on of the total number of participants, which is one of the primary aims of TEGL 17-05.

What Should be Reported? A participant is defined as a job seeker who provides basic contact information (including a social security number or a system-generated unique identification number) and receives any WIA or Wagner-Peyser funded services in a One-Stop Career Center, satellite center, a partner agency's physical location, or via the Internet. For data management purposes, many states have reporting systems that enable them to track job seekers who receive services remotely. All states are encouraged to develop this capacity so that sufficient program management data will be available to provide businesses, the Congress and the general public a more complete and accurate picture of the level of services provided. Furthermore, the definition of workforce information includes providing general information on state and local labor market conditions; industries, occupations and characteristics of the workforce; area business identified skills needs; employer wage and benefit trends; short and long-term industry and occupational projections; worker supply and demand; and job vacancies survey results. Workforce information also includes local employment dynamics information such as workforce availability; business turnover rates; job creation; and job identification of high growth and high demand industries.

Given this definition, standardized self-service participant counts can be obtained most practically by counting self-service only participants who are identified by means of an online registration process. While individual state online systems will vary, in general, only those individuals who complete a registration process and engage in self-directed or informational activities, such

as posting a resume or application, searching for job opening, or requesting a referral to a job listing are to be counted as self-service Wagner-Peyser and WIA Adult program participants. All anonymous individuals are excluded as are individuals that do not provide a social security number (or alternative unique identification number).

This method of counting self-service only participants provides a count of individuals that receive self-service information, facilitates the ability to track the self-service participants who choose to obtain additional staff-assisted services, and allows for the inclusion of self-service participants in the calculation of outcomes for the Wagner-Peyser Employment Service.

The major drawbacks to this approach is that individuals will have to voluntarily register in order to be counted, it will cause a double counting of these participants in our current performance reporting design and it lacks an automated approach to track where the individual accessed the information (whether it was in a One-Stop Career Center, local library or at home).

Why should all self-service only participants be counted in both the Wagner-Peyser Employment Service and WIA programs? Under the current ETA policy stated in TEGL 17-05, if self-service activities are funded by a mixture of Wagner-Peyser and WIA program funds, these participants should also be reported under the Wagner-Peyser Employment Service, where they are subject only to the pertinent Wagner-Peyser performance accountability measures. To ensure a consistent approach to the collection, funding, and reporting of self-service only participants, states should report self-service participants in both the Wagner-Peyser Employment Service and WIA Adult program if any combination of Wagner-Peyser and WIA funds is utilized for the provision of these services.

Can self-service only participants be counted in the WIA Dislocated Worker program? No. Although some states have developed creative approaches to allow for self-service only participants to identify themselves as displaced workers, none of the approaches were without significant caveats or a heavy reliance on self-attestation. As such, it is preferable to count all self-service only participants in the WIA Adult program.

Where Should the Data be Reported? Since all self-service only participants should be counted in both the Wagner-Peyser and WIA adult programs, they are to be reported on the ETA 9002 Report, WIA Quarterly Report (ETA 9090), WIA Annual Report (ETA 9091), and as individual WIA participant records (quarterly WIASRD).

- **ETA 9002 Report**

Self service participants are to be included in the total participant counts and in the subset count of participants who received workforce information services. Note that for the Wagner-Peyser Employment Service, outcomes for self-service only participants must also be reported.

- **WIA Quarterly Report (ETA 9090)**
Self-service only participants are to be reported in the total customer count, the total WIA Adult program participant count and the total self-service only participant count. Upon exiting the workforce investment system, they should also be reported in the total adult exiters count, the total WIA Adult program exiter count, and the total self-service only exiter count.
- **WIA Annual Report (ETA 9091)**
Self-service only participants and exiters are to be included in the table M. Self-service only participants are to be reported in the total adult customer count, the total WIA Adult program participant count and the total self-service only participant count. Upon exiting the workforce investment system, they should also be reported in the total adult exiters count, the total WIA Adult program exiter count, and the total self-service only exiter count.
- **Workforce Investment Act Standardized Record Data (WIASRD)**
States should include the individual record data on self-service only participants in the quarterly WIASRD submission. ETA will separate self-service only records from the main file, and apply a limited set of edit checks – see attachment E to TEGl 17-09 (Quarterly Submission of WIASRD). A self-service only participant is identified in the WIASRD when field 331 (Received Core Self Services and Informational Services) = 1 plus field 332 (Date of First Staff Assisted Core Service) = Blank, plus field 334 (Date of First Intensive Service) = Blank, and field 335 (Date Entered Training) = Blank. Please note that for individuals who receive more than self-services, states must report a valid date in field 332 (Date of First Staff Assisted Core Service).

How Should the Data be Collected? As stated above, the use of a voluntary online registration process to collect information on self-service only participants is the best approach for improving consistency in the reporting of these participants while maintaining compliance with the currently approved performance reporting system. If designed correctly, this process should encourage participants to provide general demographic information and a unique identification number (such as a social security number).

Self-service participant records should contain the following information in order to be officially reported as a participant and/or exiter.

- Name
- Address
- Unique Identification number (States **must not** report Social Security numbers in WIASRD)
- Date of birth - mm/dd/yyyy (or alternative means of identifying that WIA participants are aged 18 or older) - Item 102
- Veteran Status - Item 111

States are reminded that they are required to attempt to obtain and report equal opportunity information, including gender, age, disability, ethnicity, and race for all individuals who apply for benefits or services financially assisted by the workforce investment system. The responses to questions related to equal opportunity information are to be self-disclosed by the individual and is voluntary.

As a result of these requirements, states are encouraged to request the following information, although it is not specifically required:

- Gender - Item 103
- Disability - Item 104
- Ethnicity - Item 105 through Item 110
- Veteran Characteristics
 - Campaign Veteran - Item 112
 - Disabled Veteran - Item 113
 - Recently Separated Veteran - Item 114
- Employment Status at Participation - Item 115

States may consider asking self-service only participants to provide the following information or to obtain it via data matching if that is more practical:

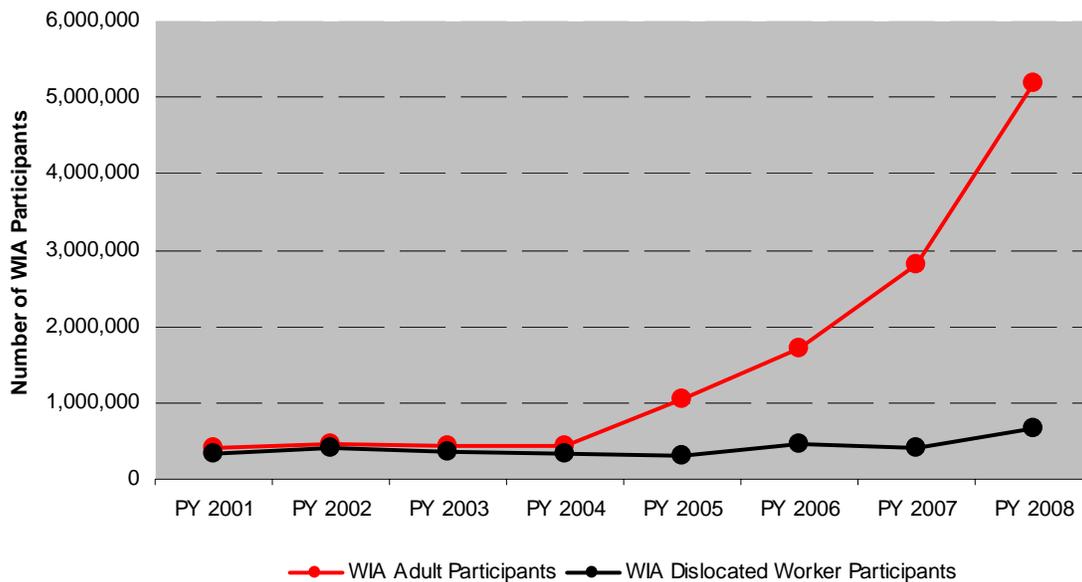
- Email
- Phone number
- Limited English Proficiency - Item 116
- Single Parent - Item 117
- UC Eligible Status at Participation - Item 118
- Low Income - Item 119
- TANF - Item 120
- Other Public Assistance Recipient - Item 121
- Highest School Grade Completed - Item 122
- Displaced Homemaker - Item 123
- Homeless and/or Runaway youth - Item 125
- Offender Status- Item 126
- Pregnant of Parenting Youth - Item 127

- School Status - Item 129
- Foster Care - Item 131

Since the use of an online registration process is the most common approach currently used to identify and track self-service only participants, this recommendation should not dramatically alter the reporting process used in the majority of states.

7. Impact of Self-Service Reporting. ETA’s policy of reporting self-service only participation is one of the major factors contributing to the dramatic increases in the total number of WIA Adult program participants who are reported.

Figure 1. Total Number of Annual WIA Adult and Dislocated Worker Participants PY 2001 - PY 2008



Source: WIA Annual Reports

For instance, Figure 1 shows that the total number of WIA adult participants was relatively constant from PY 2001 to PY 2004 before it increased substantially from PY 2005 onwards. In fact, the total number of WIA adult participants increased from around 450,000 in PY 2004 to well over 5 million by PY 2008.

The self-service only participant counts included in Table M of the PY 2008 state WIA Annual Reports are indicative of significant variation in self-service participation/reporting across the states and territories, where states are reporting anywhere from just under 900,000 self-service only participants to none at all. Furthermore, there are significant differences in the way states are interpreting the reporting instructions for reporting aggregate self-service only

participant counts on the WIA Annual Report.

Table 1 below contains the annual state-level PY 2008 participant counts for the WIA Adult and Dislocated Worker programs. Column one (Total Adult Customers) is an aggregate count of adult and dislocated worker participants. Column two (Total Adults – Self-Service Only) is an aggregate count of self-service only participants. Column three (Adult + Dislocated Worker Participant Counts) is a summation of the individual WIA Adult plus WIA Dislocated Worker participant counts (for most states this summation is either the same or slightly higher than the Total Adult Customer count due to co-enrollments). All of the data in the table are sorted on column two (Total Adults – Self-Service Only).

Three states (shaded rows) are not including self-service only participant counts in their Total Adult Customer, WIA Adult and WIA Dislocated Worker participant counts. These states are interpreting the reporting instructions/specifications for the WIA Annual Report to mean that self-service participants are only to be reported in the self-service only count. On the other hand, two states (bolded numbers) are reporting self-service only participants in their Total Adult Customer counts but not in the individual WIA Adult and WIA Dislocated Worker participant counts. The remaining states are either reporting self-service only participants in their Total Adult Customer, WIA Adult and WIA Dislocated Worker participant counts or no self-service only participants at all.

Table 1. PY 2008 WIA Annual Report - Table M - Participation Levels

| State | Total Adult Customers | Total Adults (Self-Service Only) | Adult + Dislocated Worker Participant Counts |
|--------------|-----------------------|-------------------------------------|---|
| MI | 919,570 | 871,536 | 919,570 |
| TX | 508,650 | 466,911 | 509,807 |
| ID | 412,690 | 410,734 | 412,737 |
| MO | 350,773 | 334,563 | 351,306 |
| OH | 324,711 | 292,176 | 33,683 |
| UT | 328,992 | 188,411 | 328,992 |
| KY | 191,498 | 177,181 | 194,189 |
| MD | 162,561 | 158,350 | 163,238 |
| WA | 134,498 | 120,898 | 135,084 |
| IN | 265,507 | 109,338 | 291,700 |
| IL | 135,498 | 107,330 | 135,568 |
| IA | 3,960 | 96,705 | 3,961 |
| MT | 91,131 | 88,985 | 91,131 |
| HI | 1,249 | 73,516 | 1,276 |
| VA | 81,637 | 71,101 | 81,717 |
| NH | 53,992 | 52,177 | 53,992 |
| OK | 107,516 | 47,776 | 112,902 |
| NY | 703,860 | 45,216 | 718,915 |
| NJ | 54,308 | 41,742 | 55,493 |
| LA | 224,395 | 38,872 | 226,667 |
| AZ | 48,205 | 38,681 | 48,265 |
| WY | 37,174 | 36,508 | 37,180 |
| KS | 36,907 | 30,741 | 36,950 |
| RI | 33,376 | 30,426 | 33,393 |
| NV | 33,564 | 30,307 | 33,927 |
| CT | 31,319 | 27,235 | 31,335 |
| AR | 27,963 | 24,881 | 27,968 |
| ND | 25,650 | 24,272 | 25,693 |
| SC | 48,656 | 18,990 | 49,365 |
| NM | 21,796 | 18,152 | 21,830 |
| NE | 17,879 | 16,005 | 1,874 |
| TN | 36,628 | 12,285 | 37,360 |
| MA | 17,167 | 5,750 | 17,300 |
| DE | 5,223 | 4,180 | 5,227 |
| VI | 2,350 | 2,849 | 2,379 |
| AK | 4,486 | 2,805 | 4,504 |
| ME | 3,324 | 910 | 3,324 |
| DC | 1,793 | 812 | 1,823 |
| PR | 20,338 | 518 | 20,338 |
| OR | 161,479 | 34 | 161,479 |
| MS | 108,326 | 11 | 108,328 |
| VT | 724 | 5 | 724 |
| WV | 4,552 | 5 | 4,579 |
| AL | 5,502 | 0 | 5,502 |
| CA | 180,153 | 0 | 177,004 |
| CO | 6,211 | 0 | 6,365 |
| FL | 38,073 | 0 | 38,643 |
| GA | 12,618 | 0 | 12,723 |
| MN | 10,295 | 0 | 10,305 |
| NC | 14,301 | 0 | 14,357 |
| PA | 22,431 | 0 | 22,662 |
| SD | 2,451 | 0 | 2,512 |
| WI | 15,684 | 0 | 15,798 |
| Total | 6,093,594 | 4,119,880 | 5,842,944 |

Source: PY 2008 WIA Annual Reports

8. Action Requested. Please make this information available to appropriate program staff. States are requested to ensure that all performance information reported to the Department of Labor is accurate and complete. If a state is not reporting self-service only participants, the state should follow the direction offered by the “roadmap” to resolve this issue.

9. Inquiries. Questions regarding performance reporting should be directed to the appropriate ETA Regional Office, or to the Office of Policy Development and Research, at ETAperforms@dol.gov.