

### General Eligibility

- 1) **Is the Indian/Native American stipend received by some tribe members considered countable income under WIA?**

Answer: No, this is not considered countable income under the Workforce Investment Act (WIA). We will add this to the list of items **not** included in family income contained in the WIA Eligibility Determination and Documentation Guide.

- 2) **If so, if the tribe member receives their annual allocation in one check (example \$12,000) within 6 months of becoming a WIA participant, do you have to include it all as income? Or, do you pro-rate it? (e.g. \$12,000 divided by 12 months = \$1,000 month. Consequently, \$6,000 would be their past six month income).**

Answer: Since the Native American stipend is not countable income under WIA, this question does not apply. However, if you have a stipend or payment that is countable income and covers a period of time greater than the previous six months of becoming a participant--under most circumstances, you would pro-rate it by the month when determining income.

- 3) **Family Size – do you count unmarried couples who live together (e.g. domestic partnerships) as a family and include all of their incomes when determining eligibility? The Eligibility Guide does not address this scenario yet it is fairly common.**

Answer: No, we do not count unmarried couples who live together as a family. The State of Wisconsin does not recognize common-law marriage. The term family means two or more persons related by blood, marriage, or decree of court, who are living in a single residence, and are included in one or more of the following categories: (a) a husband, wife, and dependent children; (b) a parent or guardian and dependent children; and (c) a husband and wife. (WIA Section 101(15)). So, the only way to count the "partner's" income is if there is some type of court decree.

For non-USA citizens, there may be exceptions for the absence of a marriage that is legally recognized in the USA/by the State of Wisconsin. You may use other federal/state program (immigration, public assistance, etc.) records to document that the individual is a member of a family. If that documentation is not available, you may use a self-attestation statement that even though there is no US recognized marriage, the marriage is recognized by their culture and community of origin. If you anticipate having a number of people in this situation, you may want to make up a form they can sign.

- 4) **Can you provide guidance on providing services to clients who have not or will not register for selective service?**

Answer: WIA Policy Update 08-06 – Selective Service Registration answers this question.

5) **Documentation of Citizenship: Can Drivers License and Social Security Card together be used to verify citizenship?**

Answer: Citizenship is not required for WIA eligibility. The eligibility requirement is citizenship or eligible to work. A customer may present documentation of either citizen status or legal right to work in the United States. The social security card is acceptable documentation for "eligible to work". Citizenship or Eligible to Work documentation is addressed on Page 5 of the Guide to WIA Eligibility Determination and Documentation.

<b>criteria in effect in the WDA.</b>	
<p><b>Citizenship OR Eligible to Work</b></p> <p>NOTE: Citizenship is not required for WIA eligibility. A customer may present documentation of either citizen status or legal right to work in the United States.</p>	<p><b>Citizenship documents:</b></p> <ul style="list-style-type: none"><li>• *U. S. Passport (unexpired or expired)</li><li>• *Certificate of U.S. Citizenship (INS Form N-560 or N-561)</li><li>• *Certificate of Naturalization (INS Form N-550 or N-570)</li><li>• *Original or certified copy of a birth certificate issued by a state, county, municipal authority or outlying possession of the United States</li><li>• Native American tribal document</li><li>• Consular Report of Birth Abroad or Certification of Birth</li><li>• Certification of Birth Abroad issued by the Department of State (Form FS-545 or Form DS-1350)</li></ul> <p><b>Authorizations to work:</b></p> <ul style="list-style-type: none"><li>• Unexpired Employment Authorization Document issued by the INS</li><li>• U.S. social security card issued by the Social Security Administration (other than a card stating it is not valid for employment)</li><li>• Unexpired foreign passport, with I-551 stamp or attached INS Form I-94 indicating unexpired employment authorization</li><li>• Alien Registration Receipt Card with photograph (INS Form I-151 or I-551)</li><li>• Unexpired Temporary Resident Card (INS Form I-688)</li><li>• Unexpired Employment Authorization Card (INS Form I-688A)</li><li>• Unexpired Reentry Permit (INS Form I-327)</li><li>• Unexpired Refugee Travel Document (INS Form I-571)</li><li>• ID Card for use of Resident Citizen in the United States (INS Form I-179)</li><li>• One verification source from List A of the I-9 Form OR one verification source from List B AND one verification source from List C of the I-9 Form. See <a href="http://www.uscis.gov/files/form/i-9.pdf">http://www.uscis.gov/files/form/i-9.pdf</a> and also see Attachment 3.</li></ul>

**Youth Eligibility Questions**

6) **Provide the definition of what is considered an offender under the WIA Youth Program? Specifically, how serious does the crime have to be?**

Answer: Accurate completion of this data element in ASSET and ensuring acceptable documentation to support it are important since it is one of the five criteria that can make a youth eligible for WIA services. DOL's definition of a youth offender is an individual who either: a) is or has been subject to any state of the criminal justice process for committing a status offense or delinquent act, or b) requires assistance in overcoming barriers to employment from a record of arrest or convictions, including misdemeanors. A status offense is an action that is prohibited only to a certain class of people, and is most often applied to offenses only committed by minors. Some examples include underage consumption of alcohol, tobacco, truancy, running away from the home, and general inability to be controlled by adults. Case managers must ensure they place acceptable documentation in the

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participant file or in ASSET which validates why they determined the youth was an offender. Acceptable documentation includes documentation from the juvenile or adult criminal justice system, court records, letter of parole, police records, statement from halfway house, statement from probation officer, newspaper which includes the date and name of publication, WIA registration form signed and dated in which the participant self-attests they are an offender, or an applicant statement shared with the case manager and documented in the ASSET case notes.

- 7) **On the ASSET Youth Program screen, what is the difference between the two ASSET fields labeled "needs additional assistance" and "Faces Serious Barriers"?**

Answer: WIA Policy Update 08-03 - WIA Youth Eligibility (Low Income and "Needs Additional Assistance"/Non-Low Income and "Faces Serious Barriers") answers this question.

### Adult and Dislocated Worker Eligibility Questions

- 8) **Provide the definition of what is considered an offender under the WIA Adult and Dislocated Worker (DW) Programs? Specifically, how serious does the crime have to be?**

Answer: Karen will provide this.

- 9) **Explain Displaced Homemaker on the DW Program Screen. When would you use this?**

Answer: Displaced Homemakers (male or female) who were dependent upon a family member's income, are eligible for WIA Title 1 DW Program services. U.S. Department of Labor (DOL) defines a displaced homemaker as an individual who has been providing unpaid services to family members in the home, and

- Has been dependent on the income of another family member, but is no longer supported by that income; **and**
- Is unemployed or underemployed and is experiencing difficulty in obtaining or upgrading employment.

The most common circumstances that lead to displacement are divorce, layoff of a spouse or death of a spouse. "Underemployed" means the individual is either (1) working full-time and has an earned income, which if annualized, would be equal to or below self-sufficiency; or (2) working part-time and seeking full-time work. Self-sufficiency is defined by the Workforce Development Board (WDB) in its WIA Plan.

- 10) **Explain DW Employed/Unemployed/Employed – Letter of Termination. How does “Employed – Letter of Termination” affect the Entered Employment Performance Measure? Is the person treated as coming on the program unemployed or employed?**

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Answer: The definition of a dislocated worker is outlined on Page 3 of the DW, National Emergency Grant (NEG) & Trade Adjustment Assistance (TAA) Performance Measures Technical Assistance Guide. A dislocated worker who has received a letter of termination is considered to be unemployed and should be reported as such on the Manage Programs screen in ASSET. Because they are unemployed at participation, they are counted in the Entered Employment Rate.

**WEBi**

**11) How do you do mailing lists in ASSET?**

Answer: If local areas want mailing lists and labels, they should submit a request to Diane Bartels, Department of Workforce Development (DWD). The request should include a description of who should be on the mailing list and the size of the labels.

**12) Which WEBi reports are most accurate, most helpful for certain kinds of information?**

Answer: That depends largely on what you want to accomplish with the data. WEBi will only be as accurate as the data you have entered into ASSET. A WEBi Data Warehouse Directory was distributed during the 2008 performance technical assistance sessions to help users decide which reports might be most useful.

**Suggested ASSET Changes From Local WDA Staff**

**13) Can the data fields for entry of planned service dates be removed since they sometimes lead to exits occurring? Several examples were provided. Typically, the scenario is that the case manager thinks they entered actual dates into ASSET but they only put in planned dates. Consequently, the participant ends up exiting.**

Answer: As of performance technical assistance sessions conducted through August 7, this does not appear to be an issue for WDBs. DWD will survey remaining WDBs on this issue to determine if a change should be pursued on this feature. If there appears to be support across the board for making a change, the ASSET User Group will be consulted before proceeding with any recommendation.

**14) Can some of the services be taken out of ASSET? There are so many services in ASSET that is hard to report on all of them. (e.g. instead of resume development, have career development).**

Answer: This can be done if all WDB and Job Service (including Veterans) staff can agree on which services are needed. The TAA program has already accomplished a similar task. DET staff advised the group that the ASSET User Group is the most appropriate forum for initiating this discussion. We recommend that the User Group invite TAA staff to their meeting to discuss how they approached this. Annette Nekola is agreeable to talking about this with the ASSET User Group and stated the best place to start may be to get some frequency reports run to see what services are actually being reported and work from there.

- 15) **Financial Literacy service training is strongly emphasized by DWD and local programs. But the only mention of it in ASSET is on the Youth service menus. Staff asked if it was possible to add it to the list of services that are available to Adults and Dislocated Workers. The main problem with this is that no one could agree where it ought to go, since this activity has many levels and dimensions, depending on the customer needs.**

Answer: This will be referred to the ASSET User Group for further discussion and recommendations.

### **ASSET Entry**

- 16) **O\*Net Codes: What is the purpose of writing the job title in Manage Customer Screen when after you enter the O\*Net, the job title disappears? For the Employment Screens, why do you have to go through the whole process of finding the O\*Net when you can just type in the job title without the O\*Net? How are these O\*Nets used?**

Answer: The logic was written to accommodate all programs. Remember that ASSET is used by more than Title I programs. Fields in ASSET may there for a variety of reasons. It may be data needed for Federal, State, or local program providers. (meaning, we didn't think it up on our own).

The job title disappears so staff can add additional job titles (that creates the O'Net code) that may be pertinent to a customer's training, experience, or experience needs prior/during participation in a WIA program. For example, a registrant may identify they have job skills in a specific area but are interested in another occupation.

We may check to see whether or not the individual entered Training-related employment during the first 3 quarters after exit, and then what was method was used to determine "Training Related" employment. (if the O'NET Code for the training is the same as the employment O'NET code). The information is captured on the Manage Follow-Ups, Follow-Up Status, Entered Employment Overview tab in ASSET. Some of the O'NET codes are used to meet reporting requirements.

- 17) **When enrolling in Occupational Training, an Individual Training Account (ITA) overview screen is done. If this participant co-enrolls into another Title 1 program, does a second ITA overview screen have to be done? The ITA number isn't changing.**

Answer: We believe that this is subject to local and case manager discretion. State and Federal policies simply require that ITAs be set up for participants who are receiving covered training services. We see no reason to create separate or subsequent ITA overview screens if all of the training services provided occur during a specific program episode and are part of the participant's employability plan. ITAs are used to pay for training services, regardless of the program(s) in which the participant is enrolled.

- 18) **Credentials: What should be reported in ASSET? If a person gets three credentials, do we report them all? What about On-the-Job (OJT) training or other credentials/certificates that the state doesn't recognize, do they need to be put in ASSET?**

Answer: All credentials a participant earns should be reported in ASSET. If State or local policy does not recognize a particular credential, document its attainment in ASSET case notes or in the comments section of the OJT service screen.

- 19) **Dislocated Worker staff asked why, when grant IDs undergo conversion each June/July, the service actual start dates don't carry over onto the new service screens. Planned dates apparently are carried over.**

Answer: The two service records are supposed to represent one long, unbroken service that was provided, just with a switch of funding and/or provider. The most accurate way of representing what is occurring would be to not create a new service record. In that case, the grant and/or contract ID would be updated, with the change reflected in Event History. The problem with doing that, is that queries for the old grant and/or contract ID would miss these records, because Business Objects and Federal Deliverables are not set up to query against Event History, which is just a log of changes made to participant records.

The way ASSET is set up allows the updates, while preserving history and allowing report generation, and avoiding too much undo complexity and expense.

- 20) **A number of people commented about some changes that were made to the ITA provider list awhile ago. Local staff were critical of changes that have been made to the ITA search functions. They find the ITA provider lists to be "difficult" to use now, because they are arranged in numerical order, rather than alphabetical order. They say that it didn't used to work this way. They also felt that the search engine is too limiting. For example, if you type in the keyword "Nursing", you will only get a portion of the total number of programs that are available. Thus, if you're looking for RN training, you have to type that in directly, instead of just using the broader term.**

Answer: When the new ITA website (<http://www.wisconsinjobcenter.org/ita>) was launched in 2006, it established new functionality for the ITA/ETP system, both behind-the-scenes and public-facing. For the former, an Educational Training Provider (ETP) database was created where none existed before; one that could "talk" to ASSET for improved accuracy in customer tracking of ITA program participants. This was a major improvement over the previous system which, while simple, lacked the sophistication necessary for scalability.

The initial ITA web site had one feature: a dedicated keyword search tool that returned a link to any ITA document that contained a matching word or phrase. That feature was replicated in the February, 2006 release. In addition, the ability to filter records by the name of the school, and the city in which training is provided, became part of the system based on customer demand.

It's certainly not a perfect system. For example, some schools offer training programs by the hundreds. This is especially true for the leading training providers, i.e., the Wisconsin Technical College System. Only ten programs are displayed at one time, which can make searches somewhat tedious. And, they're listed in order of their ITA Program ID, and not alphabetically. That is convenient exactly 50% of the time.

The "City" sort, while nice, cannot approximate the distances a training seeker might drive in his or her market service area to receive training. While that doesn't limit choices, it does force one to consider lots of city names when seeking unspecified training.

Another complication is capturing the increasing number of distance learning opportunities that appear on the Statewide List. Because "City" is a reflection of a place name, when the training becomes mobile it creates a situation that doesn't match the database.

So, the good old-fashioned keyword search keeps a happy home. It's uncomplicated, convenient, utile ... and not completely flawless. It still searches for keyword *matches*. For example, "RN" doesn't match "nurse", and "nurse" doesn't match "nursing". But, it can be fooled, because keying "nurs" will produce *matches for both* "nurse" and "nursing".

Wouldn't it be great if more features could be added? Sure. Unfortunately, some sought-after behind-the-scenes plans for a training provider interface were scrapped in the budget crunches. But there is always hope, and the current impetus for additional on-line services may raise the profile of this system. If that's the case, it helps to collect all current concerns regarding system use. If you have a comment or a recommendation for an improvement, contact Mark W. Wurl at [mark.wurl@dwd.wisconsin.gov](mailto:mark.wurl@dwd.wisconsin.gov), or call 608/266-4497.

- 21) **If more than one WDB serves a customer during the same program episode, how do you determine which WDB gets the performance credit?**

Answer: This information is pulled from the Manage Programs, Title 1 tab in ASSET.

- 22) **The Individual Employment Plan (IEP) in ASSET does not retain historical information. This means that staff have to print out multiple copies to make sure that we capture each version of the plan before the goals and activities change. It also means obtaining signatures each time the document is printed out. Is there any way to change this?**

Answer: The IEP was originally designed to be a dynamic document, which draws information from other locations within ASSET and shows a record of the participant's current goals and objectives. The original designers assumed that achievements and other historical information would be documented elsewhere in the system (e.g., case notes, skill attainment screens, service screens, etc.). Since the information in the plan has no bearing on performance outcomes or Federal

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reporting requirements, it has been left largely unchanged since it was originally implemented.

The original and updated IEPs for Adults and Dislocated Workers should be printed out, signed and dated by the participant and case manager, and a copy should be placed in the participant file.

The original Individual Service Strategy (ISS) for youth should be signed and dated by the Staff, case manager, parent, and participant. All updates to the ISS can be signed by the case manager and participant only and a copy of the updated ISS should be sent to the parent/guardian and a copy placed in the participant file.

- 23) What is DWD's policy regarding who gets Social Security Number (SSN) verification capability in ASSET? One of the case managers had the HIRE Center said he was not allowed to have it per DWD's policy; yet other case managers in the room had this access.**

Answer: Per the Governor's directive access to SSNs will be restricted in ASSET. The programming to limit SSN verification to central office staff in ASSET was completed by DWD in Fall 2008. We are not granting SSN verification to any new staff.

**Dislocated Worker Questions**

- 24) How are performance measures completed when the participant is co-enrolled in WIA and TAA.**

Answer: The TAA performance measures are Entered Employment, Employment Retention, and Average Earnings. The measures are calculated the same way as for Adults and Dislocated Workers. There is no Employment and Credential Attainment measure in TAA. If a participant is co-enrolled, the programs are coordinated and the measures work in tandem. That is, there will be the same outcome for each program for Entered Employment, Employment Retention, and Average Earnings. Also, a training service, whether funded by WIA or TAA will put the participant in the WIA credential measures.

- 25) Can some of the services be taken out of ASSET? There are so many services in ASSET that is hard to report on all of them. (e.g. instead of resume development, have career development).**

Answer: This can be done if all WDB and Job Service (including Veterans) staff can agree on which services are needed. The TAA program has already accomplished a similar task. The ASSET User Group is the most appropriate forum for initiating this discussion and we recommend they invite TAA staff to their meeting to discuss how they approached this. Annette is agreeable to talking about this with the ASSET User Group and stated the best place to start may be to get some frequency reports run to see what services are actually being reported and work from there.

- 26) **Sometimes NEG grants end before the participant has completed their training so they are made participants under WIA Title 1 Dislocated Worker Program. Since their NEG training occurred before the individual's WIA participation date, then NEG training does not count for the credential attainment measure. Is there anyway this can be corrected or changed?**

Answer: If training has not been completed by the time the NEG ends, the training service should be closed out under the NEG and then opened under WIA Dislocated Worker. In these cases, they will be in the T1 credential measure. Those who only receive services under the NEG or who exit before they become WIA Dislocated Worker participants will not be in the T1 credential measure. This cannot be changed. Refer to the explanation of the Employment and Certificate/Credential Attainment Rate found in the *WIA Title 1-B Dislocated Worker, National Emergency Grant and Trade Adjustment Act Performance Measures Technical Assistance Guide*.

- 27) **How should case managers handle it when they have a participant who is co-enrolled in the TAA and WIA Dislocated Worker programs yet is not receiving any services other than collecting unemployment insurance as part of their TAA eligibility?**

Answer: While it may appear to some that the TAA person is only "collecting UI", in fact they are receiving Trade Readjustment Act (TRA) payments which are a benefit under the TAA program payable to persons in approved training or conducting a work search. This question came up in the context of people being "inactive" - this is another reason to have regular case managers meetings.

- 28) **"Employment at Participation" continues to be a topic of confusion for Dislocated Worker staff. Even though the meaning of "employment" is supposed to be pretty straightforward, staff still struggle with how to report a dislocated worker who has a WARN or other layoff notice and is working a part time job to make ends meet. We need to put together a short Question/Answer response to this that could then be added to the ASSET On-Line Help Manual, since the question comes up with some regularity.**

Answer: DWD is awaiting a response from U.S. DOL.

- 29) **There is confusion about reporting the eligibility criteria on the Manage Programs Dislocated Worker tab in ASSET. The specific problem is with selecting the most appropriate Federal reporting criterion. The caption at the start of this section states: "Dislocated Worker must meet at least one of the Federal Criteria:..." Attendees said they thought they had been told that only one criterion should be selected, so they don't understand why the caption is worded as it is.**

Answer: Typically, only one of the Federal criteria applies and only one should be reported. ASSET changes are not necessary.

- 30) **Are the WIA Title 1 Dislocated Worker and TAA exits dependent on each other? In other words, can you exit the WIA Title 1 Dislocated Worker and keep them active in TAA or vice versa?**

Answer: When you have a participant who is co-enrolled in WIA Title 3, WIA Title 1 (Adult, DW and/or Youth) and/or TAA, the participant is not exited until all program activities are ended under WIA Title 1, Title 3 and TAA. The exit processes were separate up until about two years ago when we implemented the common exit for all participants tracked in ASSET. The only way a TAA exit could be executed separately is if the participant was never served by WIA Title 1 or WIA Title 3.

### Youth General Questions

- 31) **When a youth graduates from high school in December, and the school doesn't give diplomas until the Spring, can a letter from the school be verification of the student's graduation in December?**

Answer: Yes. It must be on school letterhead and must contain the youth's name and graduation date. It should also contain the name and title of the person providing the information. An e-mail containing this information would also suffice.

- 32) **When there is a time span between Design Framework activities and when the youth becomes a participant, should certain personal information be updated, i.e. age, school status, income, employment status? Is there a time limit that a youth can be in Design Framework before they become a participant?**

Answer: The information on the Manage Programs screen should reflect the youth's status on the participation date or date of first WIA-funded youth service, whichever is earlier. There is no specific time limit for a youth to be in Design Framework, however, a considerable amount of time in this phase may be an indication of program design and service delivery issues. Design Framework should not be used as a "holding tank" for youth who might some day be interested in participating in the program.

- 33) **Does ASSET have some kind of an internal system that would automatically recognize the younger youth(14-18) when they turn 19 while still active on the program? How does ASSET recognize this for performance?**

*Example: Youth enrolls in WIA at age 17, the youth turns 19 while on the program. Youth remains active in youth services. Can ASSET somehow calculate the age? Or, does a younger youth at time of enrollment remain a younger youth until they exit the youth program no matter how old they become?*

Answer: ASSET calculates a youth's age at youth entry (registration), at date of first youth service (participation) and at exit. A youth's status as an older or younger youth is determined on the date that the first WIA Title 1 funded youth service is provided. If that service actual open date occurs while the youth is age 14 - 18, the youth will always be counted as a Younger Youth in the performance measures and Federal reports. If the service actual open date occurs when the youth is age 19 -

21, the youth will always be counted as an older youth in the performance measures and Federal reports. A youth will not convert from a younger to older youth unless you exit and then re-enroll them in a new program episode.

**34) The same question goes for in-school youth that graduate from high school and are now out of school youth. Does ASSET recognize this?**

Answer: In-school youth and out-of-school youth determinations are made on the date of first youth service. If the youth is in-school on that date, the youth will always be counted as an in-school youth in performance, eligibility determinations, and Federal reports. A youth will not convert from an in-school to an out-of-school youth unless you exit and then re-enroll them in a new program episode.

**35) On the follow-up services screen in ASSET should the time frame between the Planned Enter and Planned Close dates be 12 months or 15 months to cover the 90-day WIA Exit?**

Answer: The planned open and close dates should be based on when you expect the services to begin and end. The exit date isn't a factor.

**36) In Quarterly Follow-ups, how does it work when our staff member enters "Entered postsecondary schooling" and enters wages for the youth. Is that youth excluded from the performance measures or do his/her wages count?**

Answer: Case manager-entered wage information on the follow-up screens is not used in calculating performance measures. The only wage data that is acceptable for usage in performance measures is UI wage record data. Employment in the first and/or third quarters after exit "trumps" entry into post-secondary education. Entry into post-secondary education has different effects on performance depending on the measure:

- If a youth 14 - 18 is in post-secondary education in the third quarter after exit, they are added to the Younger Youth Placement and Retention rate numerator.
- If a youth age 19 - 21 is unemployed and in post-secondary education in the first quarter after exit, they are excluded from the Older Youth Entered Employment Rate numerator and denominator. (Assumes the youth was *unemployed* at participation.)
- If a youth age 19 - 21 is **employed** and in post-secondary education in the first quarter after exit, they are counted in the Older Youth Entered Employment numerator and denominator. (Assumes the youth was *unemployed* at participation.)
- If a youth age 19 - 21 is employed in the first quarter after exit, but unemployed and in post-secondary education in the third quarter after exit, they are excluded from the Older Youth 6 Months Earnings Change and the Older Youth Employment Retention measure.
- If a youth age 19 - 21 is employed in the first quarter after exit, and **employed** and in post-secondary education in the third quarter after exit, they are counted in the Older Youth 6 Months Earnings Change and Older Youth Employment Retention measures.

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- If a youth age 19 - 21 is employed in the first quarter after exit, unemployed in the third quarter after exit and not enrolled in post-secondary education in the third quarter after exit, they are counted in the Employment Retention denominator.
- If a youth age 14 - 21 is in post-secondary education in the first quarter after exit, they are counted in the Youth Placement in Employment and Education (common measure) numerator.

**37) What are the Youth Literacy and Numeracy reporting requirements?**

Answer: The reporting requirements are discussed extensively in the All-Youth Measures Technical Assistance Guide and in WIA Policy Update 08-04.

**38) Youth Credentials: For out of school youth occupational training, when do they have to be enrolled in order to capture a credential?**

Answer: All youth are counted in the older youth credential attainment denominator, whether training occurred or not.

Youth age 14-21 are counted in the Attainment of a Degree or Certificate (common measure) if they are enrolled in education at participation or at any time during program participation. To trigger inclusion in this measure, the case manager must go to the Manage Programs, Youth tab and ensure that the field labeled "Enrolled in Education" is reported as "Yes". We will not capture the youth for this measure if you only report the service or activity. You should only change "Enrolled in Education" to "Yes" if the youth is:

- Attending secondary school,
- Attending alternative school,
- Attending in college\*, or
- Enrolled in a qualified apprenticeship program.

*\*Note: There is no service option to report college enrollment under Youth program services. If a youth enrolls in a 2-year or 4-year college/university degree program, document the activity in case notes and comprehensive assessment as a long term goal to ensure that it shows up as part of the youth's employment plan. The WDB may instruct case managers on which service to report to assure that the training is consistently reported for tracking purposes.*

If you co-enroll the youth in the Adult program to gain access to ITA funds, any training service that counts for a credential in the Adult program will put the youth into the Youth Attainment of a Degree or Certificate measure and you must report "Enrolled in Education" as a "Yes".

**39) What should a case manager put on the ASSET exit screen data field requesting guardian information for younger youth who are in foster care? Should you put the foster parent, the social worker, or who?**

Answer: The foster parent would be the legal guardian for the youth age 18 or under. Foster care youth are in the program until they are 18, so after they are 18

they can sign for themselves. Once a parent/guardian signs a form giving permission for the youth to become a participant, you do not need a signature (unless it is local policy) to provide follow-up services. Unless the person is a parent/guardian no one else can sign for an in-school youth. In the case of a youth changing foster care parent(s), the current foster care parent would need to sign.

- 40) The all youth common measures do not distinguish between older and younger youth. Will local areas need to track younger/older youth for any reason?**

Answer: Yes. Even though a move to common measures reporting changes the nature of our accountability for performance, you must still report youth performance information for the "old measures". You will still be expected to set younger youth skill goals and their attainment status. You must still report older youth credentials.

- 41) Will an older youth who enters post-secondary education be counted as a placement?**

Answer: Yes. Any youth, regardless of age at participation, who enters post-secondary education in the first quarter after exit will be counted in the Placement in Employment and Education performance measure's numerator and denominator.

- 42) Under common measures, not all youth must be included in the Attainment of Degree or Certificate measure, only those who are enrolled in education at some point during program participation. Is it correct that we may enroll a youth over 18 for job search only without impacting the attainment measure?**

Answer: Yes. The youth must be enrolled in education either on the date of first youth service or at any time during program participation. In this measure, "enrolled in education" means: instruction leading to secondary school completion, attending alternative education, enrolled in a qualified apprenticeship program, and attending post-secondary education (college). To ensure that the youth is properly counted, you must be sure to mark the "enrolled in education" radio button on the ASSET Youth Program screen as "Yes". If you do not mark this field properly, we will not pick up that youth in the measure.

- 43) If the last assumption is correct, can we also assume that serving a youth in a paid work experience or unpaid internship (not training activities) will not negatively impact performance if the youth exits with a placement in employment or education?**

Answer: Yes. However, please remember that exiting with a placement does not determine if the youth is in the measure. You must determine the youth's status in the first quarter after exit, as part of your follow-up activities. A youth who entered post-secondary education on or near the date you exited him/her does not guarantee that that activity is continued in the first quarter after exit. You must verify during follow-up that the youth continues to be enrolled in post-secondary education, military service, or employment.

- 44) If a youth originally tests at an 8.4, then retests within one year at 9.4, is there a need to retest at the end of the second year? We think not because the youth is no longer basic skills deficient. Is this correct?**

Answer: Yes, this is correct. Once the youth has achieved proficiency in reading and math, no further testing is required. We measure the gains up to the point where the youth is basic skills proficient. Once proficiency is achieved, we are not expected to track sustained proficiency.

However, if the youth exits the program and then re-enrolls for a new Youth Program episode, you must reassess the youth's basic skills proficiency. If the youth has failed to retain proficiency in either literacy or numeracy, you must help the youth regain that proficiency during the new episode.

- 45) How does a change in reporting of education status affect the credential measure?**

Answer: It depends on which education status you're referring to.

- Education Status on the Manage Programs Youth screen affects the credential measure if you report the youth as a high school graduate at participation and then report a high school diploma or equivalent as the credential earned. You will not get credit for the diploma as a credential if you reported the youth as a high school graduate on the date of first youth service.
- Education Status on the Exit screen only affects the younger youth measures. A younger youth who remains in secondary school at exit is excluded from the younger youth measures. This field has no impact on youth common measures.

- 46) Please review Literacy and numeracy reporting and requirements.**

Answer: This is also addressed in the WIA All-Youth Measures Technical Assistance Guide and in WIA Policy Update 08-04: Youth Literacy and Numeracy Gains.

- 47) Please discuss the difference of TABE scores and grade equivalents. There is confusion about a score of 8 not necessarily equating to an 8th grade equivalent.**

Answer: The confusion lies in the meaning of a plus (+) sign for certain numeric scores in the TABE Norms tables and how ASSET is programmed to determine educational functioning levels. (See the Appendix to WIA Policy Update 08-04: Youth Literacy and Numeracy Gains for further details.

- 48) If an in school youth is tested at time of participation and found to be basic skills deficient, do they need yearly testing to see where they are at in Reading and/ or Math? If we do not put a youth in Basic Skills Attainment to increase**

**Reading or Math, for performance or not for performance, we will never have to test this in school youth again. Is this true?**

Answer: While U.S. DOL requires all youth ages 14 - 21 to be assessed for basic skills proficiency, they assume that in-school youth are being tested for proficiency through the school system. The WDB is not required to test in-school youth for basic literacy and numeracy, as long as this has been assessed to your satisfaction by the school system. Just make sure that you are getting updates on assessment results from the school. You can find a discussion of this on page 14 of [TEGL 17-05](#), but it says "...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..."

- a. Any younger youth (both in-school and out-of-school) who is basic skills deficient must have basic skills goals set as part of their WIA program activities, until that youth is no longer considered to be basic skills deficient. The goals do NOT have to be designated as counting toward performance - especially if you know at the outset that it will take the youth longer than 1 year to attain the goal. It is up to the case manager and the youth to define what those goals will be, how they will be measured and who will be responsible for the measurement.

For example, let's say an in-school youth is basic skills deficient in math. You set a basic skills goal that the youth's math score will increase from the 4<sup>th</sup> to the 5<sup>th</sup> grade level by the end of the school year. The in-school youth will be tested periodically by the school system and they should send you progress reports. To the extent necessary, the case manager would arrange for tutoring and study skills activities that support the youth while he/she works toward achieving this goal. If the youth makes the stated gain within the specified time period, but is still basic skills deficient in math, you are expected to set a new basic skills goal that takes the youth to the next logical level of attainment. (At least that is how I would envision this happening.) If the youth fails to achieve the gain, the case manager should consider scaling back the goal a bit to a level of attainment that is more likely to be achieved. Skill attainment goals should never be overly ambitious or set the youth up for failure, but they should encourage the youth to strive toward making progress and improving his/her proficiency.

- b. This is different from the requirements of the Youth Literacy and Numeracy Gains measure, and that is probably why there is confusion. The Youth Lit-Num measure applies to an out-of-school, basic skills deficient youth. That youth MUST be tested at least once a year to measure gains in literacy and/or numeracy. Once the youth has achieved proficiency, testing can be stopped for the duration of that program episode.

For example, John is 17 and an out-of-school youth who reads at a 6.2 grade level and has a Total Math score that places him at the 8.5 grade level. Therefore, John is basic skills deficient in both reading and math. John and his case manager decide that since he is so close to math proficiency, they will concentrate on raising his math proficiency during his first year in the youth program. You make arrangements with the a tutoring service to help John in the areas of math where he appears to be weakest and post-test him at periodic

intervals throughout the year, because he must make it to the 9<sup>th</sup> grade level by the anniversary date of his date of first youth service.

On his first post-test, after 6 weeks of tutoring once a week, his test score increases to 563 (GE 8.8). He is still deficient, but has shown improvement. He continues to work with his math tutor for two more months and post-tests again. This time, his test score is 575 (GE 9.5). John has now achieved math proficiency, and you are not required to test him any more on his math skills. Under this scenario, you have met the minimum requirements for a successful performance outcome during his first year of program participation.

If John fails to achieve a test score of 566 (GE 9.0) or higher, it would be a good idea to also administer a reading post test just in case he made the necessary gain in reading during the year.

You should now turn your attention to his reading skills and start helping him move toward reading proficiency, even though you have met the performance measure requirements for Year 1 in the program. You place John in program activities that will focus on his reading deficiencies and administer a post test toward the end of his first year in the program. John's score increases from 523 (6.2) to 541 (GE 7.4), which is an improvement, but does not move him to the next educational functioning level, which is above 8.9 (a numeric score of 567 or higher). This test result does not hurt your performance for Year 1, because you already achieved the necessary gain for math proficiency.

John continues his studies and continues to make progress as subsequent post-tests demonstrate. About 5 months before the conclusion of his second full year in the program, John achieves a post-test reading score of 579 (GE 9.6). John has achieved reading proficiency and is not required to take any more tests.

- c. Now, let's suppose that John exits the WIA program one month after the start of his third year of youth program participation. He is 19 at the time of exit. Fifteen months later, he returns to the program for more assistance. The case manager decides he could still benefit from Older Youth program services and enrolls him. Because he is starting a new program episode, you must reassess him for both literacy and numeracy. After administering the TABE, you find that he has maintained his math proficiency, but his reading score has dropped back down to a 541 (GE 7.4). John is basic skills deficient and out-of-school and you must again work on raising his math proficiency to 9.0 grade equivalent or higher.

### **General Questions**

- 49) **Veteran's Status:** Explain on dropdown menu, "Yes, Other Eligible Person." How would this be used? Explain "Transitional Service Member."

Answer: WIA includes provisions for offering services to Veterans and "other eligible persons". Other Eligible Person is:

- The spouse of any person who died on active duty or of a service-connected disability;

- The spouse of any member of the Armed Forces serving on active duty who at the time of application for assistance under this part, is listed as:
  - Missing in action;
  - Captured in the line of duty by a hostile force; or
  - Forcibly detained or interned in the line of duty by a foreign government or power; or
  - The spouse of any person who has a total disability permanent in nature resulting from a service-connected disability or the spouse of a veteran who died while a disability so evaluated was in existence.

**50) Exit Strategies – When is the best time to take someone off the program?**

Answer: There is no magic formula that ensures perfect performance outcomes for all participants in all measures. The best time to exit the participant is when they have achieved all of their employment and training goals as outlined in their employability plan, and the case manager and participant mutually agree that no further services are needed (except follow-up).

**51) What do we do with clients who just will not respond to us, are reluctant, belligerent, or indifferent? How long do we keep trying? How do we document our efforts?**

Answer: Guidance on follow-up services is addressed in WIA Policy Update 06-06. Staff-suggested strategies to try to improve contact include:

- Strive to build strong relationships during program participation.
- The purpose of follow-up is to ensure retention. If the WDB is meeting/exceeding the retention measure it should not pursue participants to a point that becomes intrusive or participants become belligerent. The ground work for follow-up and retention should be laid out during program participation and the purpose of it emphasized. Follow-up shouldn't be done just for program compliance and performance purposes.

**52) What do we do if we determine that an activity may be beneficial to a client, but may not necessarily be good for performance? When should we decide to go that route? Do you have any insights/strategies on utilizing the OJT program? Without a credential, the OJT program isn't very effective any more.**

Answer: Participant services and activities should be based on the customer's needs and goals, in concert with program requirements and policies. If the activity is potentially detrimental to performance outcomes, but the benefit to the participant outweighs the risk, then it is logical to proceed with providing those services or activities. When Federal or State policy has a measureable negative impact on performance, this becomes a topic of discussion for performance measure negotiation at the State and Federal levels.

U.S. DOL is generally reluctant to change policies because of a feared or perceived impact on performance. When we can present facts, figures and results that clearly show a policy has a negative impact, it allows us to make a more persuasive case for

change. Even if it does not result in a credential, OJT can benefit program performance in terms of entered employment and retention rates and earnings.

- 53) The actual training completion date has to be exact for data validation purposes. This has led to a high failure rate for this particular data element. It is hard to be exact when there are variations on what date to use (e.g. graduation ceremony date, last day of class for the individual student, date the transcript is prepared, date the certificate/diploma gets signed by the educational institution, etc.**

Answer: There may be variations on this date but the point for case managers to remember is that whatever date they report in ASSET as the actual training completion date should be supported by a case note or documentation in the participant file. The data validation reviewer may see several pieces of paper in the file or several case notes related to the training completion date. This date may vary from one piece of paper to another, but the point is that one of these dates should match up to what has been reported in ASSET.

- 54) Case managers and WDB staff would like guidance on how to work with Labor Market Information (LMI) and how to integrate that information into their service delivery models.**

Answer: The audience felt LMI would be helpful to them. Staff in the DET Labor Market Information (LMI) Section are available to provide training on LMI. They have been notified that there is a need and plans are underway to provide this training. In addition, LMI will collect what WDA's needs are and how they might be able to customize products and data for individual WDAs.

- 55) A number of staff commented that SSN validation seems to be taking longer (i.e., 3 - 4 days) than it used to. We discussed this and thought that this might be related to how MCI works. If the SSNs already reside in CARES, they may be validated sooner than if they have to go directly to the Social Security Administration.**

Answer: Validation delays can be attributed to the reasons addressed above. It takes longer to process a SSN if it has to go to the Social Security Administration for verification.

- 56) Is there a specific policy within DET about printing the Manage Programs screen and getting the participant to sign and date it? Is a local form that contains the same information acceptable? Can the documentation guide include some sort of instructions about this?**

Answer: *Karen needs to answer this.*

- 57) Is there a WIA requirement requiring that WIA participants cannot be exited if they are still active in another Job Center program such as W-2, FoodShares, Child Care, Medical Assistance, etc.?**

Answer: In the Federal performance measure guidance found in TEGL 17-05, page 22, they encourage that a WIA participant who is receiving services from partner programs should not be exited from WIA until all WIA Title 1 and all partner program services have ended (except follow-up services). However, the main point and intent that local areas should follow is that exits for participants who receive services from multiple programs should be planned in a way that optimizes performance success for all of the programs, not just WIA Title 1.

**58) Why does data validation sometimes call the same files two years in a row?**

Answer: Data validation pulls files from the WIASRD. The WIASRD contains three program years worth of data. This year's WIASRD contains all participant records from PY05, PY06 and PY07. It stands to reason that there will probably be some overlap, especially in the youth program where we have smaller numbers of participants, but the same number of records pulled each year. The validation software sifts through all three program years for a "random sample". The software does not make any kind of a distinction between whether or not a customer was validated one year for Entered Employment and another year for Employment Retention. If it did that, we wouldn't have to validate first quarter employment again, since that would have already been verified on the first go-round.