

**Workforce Investment Act (WIA)
Data Integrity and Performance Policy
Handbook – Attachment A**

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Introduction

This procedural handbook accomplishes the following:

- Provides supplemental content and requirements to support WorkSource System Policy 1002, Revision 1.
- Serves as the mechanism to implement and manage current and future policy changes related to common measures. Provides guidance to staff and partners concerning WIA, SKIES, data integrity, and performance and reporting requirements, with the ultimate goal of understanding and complying with the WIA common measures initiative.
- Provides Workforce Development Councils (WDCs) with the relevant procedures and requirements to fulfill the expectations contained in Policy 1002, Revision 1.
- Supersedes WorkSource Information Notices (WINs) 0010, 0029, 0031, 0061, and 0063.

Definitions

- **Certificate** – Diplomas, certificates, and awards that meet the DOL’s definition of certificates, including the acceptable list of institutions and training organizations authorized to issue such certificates.
- **Credential** – Other than the items listed under “certificate,” credential refers to diplomas, certificates, awards, and documentation of skills attained that meet the state of Washington’s core measure definition of countable credentials but do not meet the DOL’s common measures definitions for reportable certificates.
- **Desk Side** – A two-way communication between the staff member and customer. Desk side communication may take place in-person, by phone, or by e-mail. All desk side staff assisted services require that an assessment of skills and abilities is conducted prior to service delivery.
- **Out-of-School** – A WIA-eligible youth who is (a) a school dropout (see definition of “school dropout”); or (b) an eligible youth who has either graduated from high school or holds a GED, but is basic skills deficient (BSD), unemployed, or underemployed. Note: this definition addresses “out-of-school” for the purpose of WIA Title I-B, including performance.
- **School Dropout** – An individual who is no longer attending any school and who has not received a secondary school diploma or its recognized equivalent. Note: “attending any school” is discussed in TEGl 12-01 Attachment B. It is interpreted broadly to include other programs of study (GED prep, skills training, etc.). These other programs are initially considered as part of “any school,” but

TEGL 12-01 Attachment B allows local flexibility for narrowing the definition to exclude certain programs of study.

- **State Management Information System (MIS)** – For the purpose of DEV, State MIS refers to specific, detailed information that is stored in the state’s information system that supports a data element.

In addition to the definitions listed above, key system terms can be found in WIN 0052 Attachment A, including the following terms used in this handbook:

- Participant
- Sequence of Services (Tiers of Service)
- SKIES
- Workforce Development Council
- WorkSource Center
- WorkSource System

References

- TEGL 12-01
- TEGL 17-05
- TEGL 17-05, Change 1
- TEGL 17-05, Change 2
- TEGL 4-13
- TEN 8-10
- 2013 DOLETA Data Element Validation Report for Washington State

1. Service Delivery and Participation

1.1. Alignment of Wagner-Peyser and WIA Title I-B Services

The underlying principle of the One-Stop system (WorkSource system) is coordination of fully integrated programs, services and governance structures so job seekers have access to a seamless system of workforce investment services. WIA provides three levels of services: core, intensive, and training. Service at one level is a prerequisite to moving to the next level under the WIA Title I-B Adult and Dislocated Worker programs. At a minimum, a WIA Title I-B Adult or Dislocated Worker must receive at least one core service before receiving intensive services and one intensive service before receiving training services.

Note: There is no minimum time period for participation in one tier of service before proceeding to the next tier. The intent of WIA is to allow flexibility for this progression based on the individual customer's assessed needs.

Additionally, DOL/ETA has furthered its integration efforts by establishing common performance metrics ([TEGL 17-05](#)) and developing common reporting element definitions across all DOL-funded programs.

States and local areas are encouraged to utilize common intake, case management and job development systems in order to take full advantage of the One-Stops' potential for efficiency and effectiveness (20 CFR Background, WIA Principles, Page 49295). WIA Title I-B programs and Wagner-Peyser are mandated to provide the same set of core services found at WIA Section 134(d)(2). There is a natural alignment of service delivery under Wagner-Peyser since all individuals are eligible for these services.

Note: Personal records of WIA registrants will be private and confidential and will not be disclosed to the public. Refer to [Policy 3415 Revision 1](#) and [RCW 50.13](#) for additional guidance on data privacy and security.

1.1.1 Core Services

The intent of WIA Title I-B is to provide universal access to certain services prior to intensive or training services. DOL/ETA encourages the referral of Wagner-Peyser core and intensive service recipients to Title I-B programs for intensive and/or training services when appropriate ([TEGL 11-12](#)).

Wagner-Peyser (Labor Exchange) core services can be provided to all job seekers and employers. Labor Exchange core services are available through self-services, facilitated self-help services, and staff-assisted services to ensure universal access (20 CFR 652.207(b)(2) and TEN 8-10). Although Labor Exchange services are available to all individuals, only individuals who are legally entitled to work in the U.S. can receive assistance obtaining employment. To ensure that individuals who apply or are referred are legally entitled to work in the U.S., SKIES (or its successor) and the Self Service Membership System (SSMS) (or its successor) registration both require customer attestation to legal entitlement to work in the U.S.

In addition to universal access under Labor Exchange, certain core services (e.g., self-service or informational activities) can be provided universally with WIA Title I-B funding. Individuals must be determined eligible and enrolled to receive WIA Title I-B funded core services beyond self-service or informational activities. These services are offered

under WIA Title I-B (in addition to Wagner-Peyser) to ensure seamless service delivery in the WorkSource system to minimize referrals and to ensure leveraging of resources between programs.

The types of services that can be provided without enrolling an individual are described at 20 CFR 664.140(2): “Self-service and informational activities are those core services that are made available and accessible to the general public, that are designed to inform and educate individuals about the labor market and their employment strengths, weaknesses, and the range of services appropriate to their situation, and that do not require significant staff involvement with the individual in terms of resources or time.” TEGL 17-05 clarifies that “significant staff involvement” includes staff’s assessment of a participant’s skills, education or career objectives to assist the participant in making a decision or accessing information, compared to staff providing a participant with readily available information that does not require an assessment.

Note: This policy covers basic eligibility requirements for Wagner-Peyser, including Priority of Service requirements for Covered Persons (using the broad definition of veteran – see Section 5.1). For verification of veteran status, the Wagner-Peyser program has specific requirements. For a complete overview of services for veterans (using the standard definition) under Wagner-Peyser, including verification of eligibility for these services, please refer to [Services for Veterans – 4030](#).

1.1.2 Intensive Services

Intensive services may be provided under the Wagner-Peyser Act and WIA Title I-B.

Intensive services funded under the Wagner-Peyser Act are available universally to all jobseekers and employers. All Wagner-Peyser funded services must be provided by state merit staff (20 CFR 652.215 and TEGL 11-12).

Adults and Dislocated Workers who receive services funded under WIA Title I-B other than core self-service or informational activities must be registered and determined eligible. Participants receiving intensive services funded under WIA Title 1-B must be determined eligible and in need of additional assistance beyond core services in order to obtain or retain employment. Intensive services include comprehensive assessments, development of individual employment plans and counseling and career planning.

Note: WIA youth services are not necessarily tiered. WIA Title I-B provides employment and training services for economically disadvantaged youth. Youth establish educational and career goals and work toward them via WIA-funded activities.

1.1.3 Training Services

Training services are funded and provided to jobseekers under the WIA Title I-B programs. Participants receiving training services funded under WIA Title I-B must be registered, determined eligible and in need of additional service, beyond core and intensive, in order to obtain or retain employment (20 CFR 663.310). Training services include occupational skills training, on-the-job training, workplace training with related instruction, skill upgrading and retraining, entrepreneurial training, and job readiness training.

Note: Staff determine when it is appropriate to progress Adults and Dislocated Workers to the next level of service (i.e., from core to intensive to training) in alignment with 20 CFR 663.220 and 310.

1.2. Case Management

WIA Title I-B case management decisions align with the tiers of service model and must consider the point at which core services require significant staff involvement. Core services may be “informational” (self-services and staff assisted core services), but it is important for case managers to understand the point at which a core service requires significant staff involvement (Section 1.1.1). This determination can be based on assessment results of the participant’s inability to obtain employment through self-service alone.

TEGL 17-05 encourages states to utilize integrated data and reporting systems, beyond the required DOL-funded programs, to support program integration. SKIES (or its successor) is used by multiple WorkSource-affiliated programs beyond DOL-funded programs and these programs are part of integrated case management and performance (e.g., WorkFirst).

1.3. Participation Start and End Dates

1.3.1. Date of Participation

The date of participation is a common participation date among all programs, initiated by the first program-funded qualifying service, regardless of the tier or program. As such, the initial date of participation for an individual’s participation period is common for all programs providing services to the individual within the participation period. Individuals participating in multiple programs will be counted as a participant in each of the programs, based on the date of the first qualifying service.

1.3.2. **Date of Program Completion**

The date of program completion is the date of the final program-funded qualifying service. In this sense, it is unlike the exit date, which is common across all programs rather than specific to a particular program. The program completion date may or may not be the same as the exit date. The program completion date will be equal to or less than the exit date. See Section 1.9 for more information regarding exits.

1.3.3. **Program-funded Qualifying Service**

Qualifying services that start and end participation are services provided by the following programs:

- WIA Title I-B Adult, Dislocated Worker and Youth;
- Trade Adjustment Assistance (TAA);
- Wagner-Peyser, including Self-Service and Veterans Employment and Training (VETS) programs; and
- Other WorkSource-affiliated programs (Workfirst, NEGs, MSFW, etc.) that utilize SKIES (or its successor) for data and performance reporting.

Note: Only state-level services start and end periods of participation. It is imperative that staff enter appropriate state-level services from the Services Catalog that align with services being delivered. Refer to Section 2 for more information on accuracy of service entries and the use of local services.

1.4. **Service Participation and New Participation Periods**

Individuals who receive a qualifying service, including self-services and informational activities, in a physical location or remotely via electronic technologies are part of “service participation.” Participants receiving self-services only are only reported in the W-P and WIA Title I-B service participant counts.

Once individuals achieve their original program goal and exit the system (Section 1.9), any subsequent qualifying services will initiate a new enrollment and participation period. Note: Follow-up services are delivered after the achievement of a program goal and do not correspond to the system exit. A new program enrollment and participation period will preclude the delivery of follow-up services from a prior enrollment. Follow-up services delivered within 90 days of the last qualifying service can be used to establish that participants do not need to be reengaged with qualifying services prior to exit.

1.5. Performance Participation

Not all service participants are counted in performance. Participants are counted in performance calculations if they:

- Are determined eligible to participate in a qualifying program; and
- Receive a significant staff-assisted service funded by the program at either a physical location or remotely through electronic technologies; and
- Exit the program (though the Literacy/Numeracy performance measure may include youth who have not exited). Refer to Section 1.9 for information on system exits.

For W-P, participants counted in performance are those who receive any qualifying service, excluding self-services and informational services (not requiring significant staff involvement), and have exited the system. They are included in W-P performance calculations. W-P does not have program eligibility requirements.

For WIA Title I-B, participants counted in performance are those who enroll in WIA Title I-B, receive a WIA Title I-B-funded qualifying service (requiring significant staff involvement), and exit the system. They are included in WIA performance calculations. Lit/num does not have exit requirements.

For TAA, participants counted in performance are those who enroll in TAA, receive a TAA-funded qualifying service, and exit the system. They are included in TAA performance calculations.

For WorkFirst (WF), participants counted in performance are those who enroll in WF, receive a WF-funded qualifying service; and exit the system. They are included in state WF performance calculations.

For VETS, performance participants are those who are eligible for the program, receive a VETS-funded qualifying service, and exit the system. They are included in VETS performance calculations.

1.6. Self-service and Informational Activities

Self-service and informational activities are those core services that are readily available and accessible to the general public; are designed to inform and educate individuals about the labor market, their employment strengths and weaknesses, the range of services appropriate to their situation; and provide instructions on how to use One-Stop resources. These services do not require significant staff engagement with the individual (Section 1.1.2) in terms of resources or time.

Self-service occurs when individuals serve themselves by accessing WorkSource information and tools, including Go2WorkSource (or its successor) and the Self Service Membership System (or its successor) either at a One-Stop site or from a remote electronic location. For reporting purposes, it is necessary for self-service participants to be identifiable. Because WIA and W-P funds supported development of the Go2WorkSource.com infrastructure, self-service participants will be included in both WIA and W-P service participant counts. However, participants who only obtained WIA self-service and information are not enrolled in WIA and are excluded from WIA performance measures.

1.7. Significant Staff-Assisted Services

In a workforce investment setting, significant staff-assisted service is any assistance provided by staff beyond the informational activities (i.e., readily available information) described above, regardless of the length of time involved in providing such assistance. Significant staff involvement includes staff assessment of a participant's skills, education, or career objectives in order to assist with any of the following:

- Determination of appropriate next steps in the search for employment, training, and related services, including job referral;
- Assessment of personal barriers to employment; or
- Access to other services necessary to enhance employability and individual employment related needs.

Staff-assisted services are captured in SKIES (or its successor). They may be entered either as seeker services or under a Service Plan. Accurate data entry for types of services and dates of service is critical to implementation of federal Common Measures in Washington.

In an effort to avoid misinterpretation and provide consistency across all programs, a Catalog of Statewide Staff-Assisted Services (referred to as the Services Catalog) defines each service and its applicability to participation and performance measurement. For more information refer to Section 2.

1.8. Gaps in Service (HOLD)

Any gap in service (HOLD) must be documented in SKIES (or its successor) by entering a HOLD-GAP IN SERVICE and a case note, including the rationale and verification of the participant's intent to resume participation when circumstances precipitating the hold

are resolved. Per TEGl 17-05, reasons for placing a participant in HOLD status are limited to the following:

- Delay before the start of training;
- Health/medical condition;
- Providing care for a family member; and
- Temporary move from the area, including National Guard or other military duty.

A participant in HOLD status will not exit if there is a gap in service (HOLD) greater than 90 days (from the last qualifying service). Without a qualifying HOLD extension, a participant in HOLD status will exit if there is a gap in service (HOLD) greater than 180 days (from the last qualifying service). Staff may initiate a HOLD extension of up to an additional 180 days (360 days total from the last qualifying service) only for issues that prevent the participant from completing program services that will lead to employment.

Note: A HOLD only represents an allowable gap in service as outlined in this section and does not represent an actual service.

1.9. System Exits

1.9.1. System Exit

“Exit” refers to a participant who has not received a qualifying service funded by any qualifying program (Section 1.3.3) in the WorkSource system for 90 consecutive calendar days and is not scheduled to receive future qualifying services. This definition supports the integrated service philosophy and acknowledges that a system exit is a common exit from all qualifying WorkSource system programs.

Note: “Program completion” should not be confused with system exit since completion of one program does not necessarily mean the participant has reached a true exit.

1.9.2. System Exit Date

“Exit Date” is a system-derived date determined after a participant has not received any qualifying service for 90 consecutive calendar days and is not scheduled to receive future services. In accordance with the requirements of TEGl 17-05, the exit date is applied retroactively, after a 90 day period without qualifying services to the last day on which the individual received a qualifying service provided by any qualifying program. Individuals who are participating in more than one program will have a single common

exit date based on the last completed qualifying service. This ensures that the exit date always represents the last date a service was delivered to a participant.

SKIES terminology on the Seeker Programs screen reflects this methodology for defining and deriving an exit date. The fields “Completion Outcome” and “Program Completion Date” should reflect when and why program services have ended.

Note: Exit dates are not the same as program completion dates. A system exit date is the same as a program completion date only when participants do not receive a qualifying service from another program within 90 days. Allowing staff to enter a program completion date provides program administrators the ability to maintain accountability standards for each service provider, regardless of the actual exit date. It may also expedite the State’s selection of participants for program-related customer satisfaction surveys, rather than wait for the 90 days before an actual exit determination.

1.9.3. Exit Exclusions

A participant who exits the system for one of the following reasons is excluded from all performance measures:

- Institutionalization;
- Health/Medical;
- Family Care;
- Deceased;
- Reservists Called to Active Duty;
- Relocated to a Mandated Program (Youth); or
- Invalid/Missing SSN.

Exclusions may be allowed for up to three quarters following the exit quarter. Exclusions determined subsequent to the exit quarter must be recorded in the Follow-up Plan indicating the reason and source documentation. For example, a participant who entered unsubsidized employment in the quarter after exit and sustains a serious injury in the second quarter, may be excluded due to health/medical issues. This exclusion removes the participant from all measures, including the Entered Employment Rate which had been a positive outcome.

The “Completion Outcome” field in SKIES (or its successor) is the primary source for exit exclusions. However, exclusions noted in the “Completion Outcome” field may not be applicable if the actual derived exit date is after the “Program Completion Date”. For example, an individual is no longer able to participate in WIA services due to

incarceration. If the completion outcome is entered into SKIES (or its successor) before the expiration of the 90-day period, then it is possible for the individual, if released early, to receive subsequent qualifying services still within the 90-day window. This action would extend the point of exit and void the WIA program exclusion. Cases like this can occur when staff do not wait for the 90 days to elapse without a qualifying service before entering the completion outcome and program completion date.

1.9.4. Exit-Related Reports

Because exits are based on program-funded services, ESD recognizes the need to generate exit-related reports to enable program staff to review information such as:

- When the participant completed the program and achieved their original goal;
- If the participant received a subsequent qualifying service and by which program; and
- How long it has been since the participant last received a qualifying service.

ESD, in cooperation with local areas, developed a case management report that includes this information.

Note: Exit-related reports are intended to help staff understand participation periods, including when to initiate new enrollments rather than continue to provide program services. Follow-up services do not impact exit and should begin, as needed or required (e.g., WIA youth program requires 12 months of follow up), whenever the original goal is achieved (i.e., at program completion). Refer to Section 5.3 for more information on follow-up services.

2. Services Catalog

2.1. Introduction

The SKIES Services Catalog is the list of active services that represents services delivered to job seekers within the WorkSource system. The catalog also contains the definition of each service, so users can select the service that best represents the job seeker activity. Services are categorized as Core, Intensive, Training, Follow-Up, and Support. The intended use of the Services Catalog is outlined in Section 2.3.

ESD's System Performance unit implements changes to the Services Catalog to improve the functionality and maintenance of the entire service system. The Catalog designed to provide the appropriate level of information that staff, managers, and administrators need to make decisions that offer the most value to job seekers. Decisions to activate, amend, or deactivate individual services will take into

consideration the system's entire informational needs. To the extent possible, the Services Catalog will be limited to activities that provide direct service to job seekers. Services used for administrative, tracking, or follow-up purposes will be replaced by alternatives when feasible.

2.2. Process Changes

Process changes to the Services Catalog cover four areas:

2.2.1. Services Catalog

The Services Catalog builds upon information that was contained in WorkSource Information Notice (WIN) 0010, Change 3. The additional detail will better enable staff to select appropriate services for job seekers – improving data integrity and outcome measurement. System Performance staff will also use the greater detail to conduct periodic service reviews.

2.2.2. Service Creation

Users can request new services by completing an on-line form available on *Inside SKIES*. Upon receiving requests, System Performance staff will conduct detailed analyses, including consideration of alternatives to creating new services. System Performance staff will prepare briefs that detail the service requests and implementation options. A standing group of Power Users and stakeholders will review the briefs and provide input. After the review period, System Performance will make final recommendations to ESD Employment System Administration and Policy on new service requests.

2.2.3. Service Review

Services within the Services Catalog will be reviewed on a periodic basis by System Performance staff, including usage, distribution of use across areas, and applicability to current policy direction. For services that were created to accommodate procedural or technological limitations, the review will analyze if conditions have changed sufficiently to make non-service alternatives feasible.

Based on their analysis, System Performance staff will make a recommendation for the service. The analysis and recommendation will be made available for stakeholder review. For services recommended to be deactivated or amended, notice of the recommendation and opportunity for comment will be provided through an electronic distribution list. Final decision on continuing, amending, or deactivating the service will be made by ESD's Director of Employment System Administration and Policy.

Note: Service reviews can also be requested through the on-line form on *InsideSKIES*.

2.2.4. Local Services

In addition to the Services Catalog process changes, System Performance will facilitate conversations with WDCs to better manage local services. As local services have an impact on data integrity, database management, and performance measurement, System Performance will work with WDC staff to ensure local services are functioning efficiently within the broader service universe.

2.3. Use of the Services Catalog

2.3.1. Overview

- Services within the catalog are the source data for performance and outcome measurements across the WorkSource system.
- Stakeholders within the system must review the Services Catalog on a regular basis to ensure their knowledge of available services and definitions is maintained. The Services Catalog is also available on the *InsideWorkSource* and *InsideSKIES* websites. Staff should utilize the Service Selection Matrix for information that can assist with the transition from deactivated services to newly activated services.
- Workshop services represent multiple services delivered within that specific class. Staff should not select multiple services to represent a class.
- Local workshops may still be tracked with a local service as needed, but local offices are encouraged to keep local services to a minimum. Local services are not counted for Federal performance (See Section 3.3).

2.3.2. Deactivated and Activated Services

A running list of deactivated and activated services by date is accessible in both Inside WorkSource and InsideSKIES (or its successor site) with the most recent changes appearing first. Deactivation and activation of services may require updates to local desk aids, training manuals, or procedures. Please contact your local SKIES trainer for guidance. Note: Only changes made through the WIN process after January 1, 2012 are included in the Service Selection Matrix.

3. Performance Measurement Systems

3.1. Overview

Washington has two distinct, but related, performance measurement systems that provide outcome information:

- Washington State Workforce Core Measures.
- WIA Federal Common Measures.

3.2. **State Workforce Core Measures**

The Workforce Board establishes targets for the Workforce Core Measures for the following programs:

- WIA Title I-B;
- Secondary Career and Technical Education, Postsecondary Career and Technical Education;
- Adult Basic Education;
- Vocational Rehabilitation; and
- Services for the Blind.¹

The Workforce Board sets targets for the 12 WDAs and has established policies by which the Office of Superintendent of Public Instruction and State Board for Community and Technical Colleges set targets for secondary schools and public two-year colleges, respectively.

The Workforce Core Measures include:

3.2.1. **Employment or Further Education**

Programs Serving Adults: Percentage of former participants with employment recorded in Unemployment Insurance (UI) and other administrative records during the third quarter after leaving the program.

Programs Serving Youth: Percentage of former participants with employment or further education as recorded in UI, student, and other administrative records during the third quarter after leaving the program.

3.2.2. **Earnings**

Median annualized earnings of former participants with employment recorded in UI and other administrative records during the third quarter after leaving the program, measured only among the former participants not enrolled in further education during the quarter.

3.2.3. **Skills**

¹ The five core measures are not applied to each and every program. For example, the WTECB does not survey a sufficient number of employers who have hired participants in Services for the Blind to measure employer customer satisfaction.

Percentage or number of program participants leaving the program that achieved appropriate skill gains or were awarded the relevant educational or skill credential based on administrative records.

3.2.4. Customer Satisfaction

Employer Satisfaction with Former Program Participants: Percentage of employers who report satisfaction with new employees who are program completers as evidenced by survey responses.

Former Participant Satisfaction: Percentage of former participants who report satisfaction with the program as evidenced by survey responses.

3.2.5. Return on Investment

Taxpayer Return on Investment: The net impact on tax revenue and social welfare payments compared to the cost of the services.

Participant Return on Investment: The net impact on participant earnings and employer provided benefits compared to the cost of the services.

3.3. WIA Federal Common Measures

3.3.1. Overview

The value of implementing common measures is to communicate a common set of outcome results for all programs that comprise the federally funded national workforce system: how many people found jobs, did they stay employed, and what did they earn. By minimizing the different reporting and performance requirements, common performance measures facilitate the integration of service delivery, reduce barriers to cooperation among programs, and enhance the ability to assess the effectiveness and impact of the workforce investment system (TEGL 17-05). In addition, a common performance reporting system streamlines the process to derive WIA and W-P performance outcomes. The current data files compiled by ESD to derive WIA and WP performance overlap significantly, but the new WIA Standardized Record Data (WIASRD) layout allows for the submission of a single file. Federal reports (e.g., ETA 9090 and 9091) are automatically generated from the WIASRD file. The fundamental purpose of the changes to the WIASRD is to begin consolidating the various forms of individual record layouts used by DOL-funded programs for reporting. The ultimate goal is to standardize the manner in which individual record information is collected across programs, including future consolidation of the TAPR (TAA).

Section 136(b) of WIA provides that state performance measures for WIA shall consist of 17 specific core indicators of performance and customer satisfaction. DOL/ETA was able to replace six of the 17 statutorily required WIA measures with Adult Common Measures because they were essentially modifications of the existing statutory measures. However, DOL/ETA was not able to simply substitute Youth Common Measures for the seven WIA statutory youth measures. Washington is one of many states that obtained a waiver to utilize the common measures to report the three Adult Common Measures for WIA Adult and WIA Dislocated Worker programs and the three Youth Common Measures for the WIA Youth program.

The Common Measures apply to:

- Wagner-Peyser
- Veterans Employment and Training Services
- WIA Title I-B Adult, Dislocated Worker and Youth
- Trade Adjustment Assistance
- WorkFirst²

SKIES (or its successor) is the primary system for capturing staff-assisted services and participant data. Participants receiving only self-services and informational activities are also reported. The Go2WorkSource and SSMS systems (or their respective successors) are the primary mechanisms for identifying those participants. Data from both systems is used for performance and reporting, including the calculation of common measures. Data integrity reports are pulled regularly to ensure timely and accurate data entry, which ultimately impacts the common measures calculations.

3.3.2. Adult Measures

3.3.2.1. Entered Employment

Methodology

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

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

Operational Parameters

² As a state, Washington has chosen to apply the common measures to WorkFirst. This is not a federal requirement.

- Individuals who are employed at the date of participation are excluded from this measure (i.e., programs will not be held accountable for these individuals under this measure).
- Individuals who, although employed at the date of participation, have either received a notice of termination of employment of whose employer has issued a Worker Adjustment and Retraining Notification (WARN) or other notice that the facility or enterprise will close, or who are transitioning service members are considered not employed at the date of participation and are included in the performance measure.
- Employment at the date of participation is based on information collected from the individual, not from wage records.
- Supplemental wage data, for planned self-employment only, is allowed. The employment goal at the time of participation must be “Self-Employment.” In addition, documentation of self-employment in quarters 1, 2 and 3 after exit is required.

Note: All supplemental data must be documented and is subject to audit. Case notes describing reasons must refer to documentation such as administrative records, revenue or tax records, automated database systems, participant licenses, or business-related documentation. Copies of these documents must be maintained on file for verification purposes.

3.3.2.2. **Employment Retention**

Methodology

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

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

Operational Parameters

- This measure includes only those who are employed in the first quarter after the exit quarter.
- Individuals who are not employed in the first quarter after the exit quarter are excluded from this measure (i.e., programs will not be held accountable for these individuals under this measure).
- Employment in the first, second, and third quarters after the exit quarter does not have to be with the same employer.
- Employment status at the time of participation is not considered for this measure.
- Supplemental wage data, for planned self-employment only, is allowed. The employment goal must be “Self-Employment.” In addition, documentation of self-employment in quarters 1, 2 and 3 after exit is required.

Note: All supplemental data must be documented and is subject to audit. Case notes describing reasons must refer to documentation such as administrative records, revenue or tax records, automated database systems, participant licenses, or business-related documentation. Copies of these documents must be maintained on file for verification purposes.

3.3.2.3. **Average Earnings**

Methodology

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

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

Operational Parameters

- To ensure comparability of this measure on a national level, wage records will be the only data source for this measure. Acceptable wage record sources are a state's Unemployment Insurance wage records, federal employment wage records, military employment wage records, and other administrative wage records.
- Individuals whose employment in either the first, second, or third quarters after the exit quarter was determined solely from supplementary sources, and not from wage records, are excluded from the measure.
- Employment status at the time of participation is not considered for this measure.
- Self-employment wage records cannot be used for the Average Earnings measure.

3.3.3. **Youth Measures**

3.3.3.1. **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).
- Employment and education status at the date of participation are based on information collected from the individual.
- Individuals in secondary school at exit will be included in this measure.
- Supplemental wage data, for planned self-employment only, is allowed. The employment goal must be “Self-Employment.” In addition, documentation of self-employment in quarters 1, 2 and 3 after exit is required.

Note: All supplemental data must be documented and is subject to audit. Case notes describing reasons must refer to documentation such as administrative records, revenue or tax records, automated database systems, participant licenses, or business-related documentation. Copies of these documents must be maintained on file for verification purposes.

3.3.3.2. **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

- Education refers to participation in secondary school, post-secondary school, adult education programs, or any other organized program of study leading to a degree or certificate.
- Individuals in secondary school at exit will be included in this measure.
- The term diploma means any credential that the state education agency accepts as equivalent to a high school diploma. TEGl 17-05 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.
- Work readiness certificates will not be accepted under this measure.

3.3.3.3. **Literacy and Numeracy Gains (effective through July 1, 2016)**

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.

Operational Parameters

- In-school youth are excluded from the literacy and numeracy measure. In-school under “school status at participation” include youths who are “attending any secondary school” and youths who are attending an alternative high school or an alternative course of study approved by the local educational agency whether full or part-time (TEGL 12-01 Attachment B and TEGL 4-13 Attachment A). See TEGL 12-01 Attachment B for more information regarding “attending any secondary school.”
- All out-of-school youth must be assessed for basic skills using CASAS Appraisals and Pre-Tests. An existing Pre-Test can be used if it was taken no longer than six months prior to the first Youth program service. If an existing Pre-Test is not available, the Pre-Test must be taken within 60 days of the first Youth program service to establish the baseline for the literacy and numeracy measure.
- The results of the CASAS Appraisal Test determine the appropriate CASAS Pre-Test. The Pre-Test, not the Appraisal Test, determines the EFL level of an out-of-school youth, which then determines basic skills level. If the youth is BSD, then the youth is included in the literacy and numeracy measure. The Pre-Test score sets the EFL/BSL baseline for the measure, from which literacy and/or numeracy gains are tracked.
- Minimally, within one calendar year from the first Youth program service, all out-of-school BSD youth must take a CASAS Post-Test. Youth that achieve a gain of one EFL within the year “pass” the measure, and youth that do not achieve a gain of one EFL “fail” the measure. Youth with test results indicating they are not BSD (i.e., EFL 7 or 8) are not included in the literacy and numeracy measure and are not required to take follow-up CASAS tests.
- Service providers are advised to administer appropriate levels of CASAS Pre and Post Tests throughout the year to accurately represent student gains and to leave time prior to the calendar year deadline for additional assistance if it appears the youth may fail to achieve an EFL gain. Service providers should consult with CASAS with any questions regarding how to determine appropriate test levels and/or reasonable time frames between Pre and Post Testing.

IMPORTANT NOTES:

- The CASAS Appraisal CANNOT be used in lieu of the Pre-test to establish a test score/EFL as required for the of the literacy and numeracy measure.
- WorkSource System Policy 1011, Revision 2, Attachments A and B provide more information regarding test taking strategies and accommodations for individuals with disabilities.
- No additional testing (e.g., Post-Testing) is required once an individual tests as not BSD.

3.3.4. Supplemental Wage Data

Although most employment will be identified through wage records, self-employment is not typically UI-covered and shall be regarded as supplemental wage data under the following conditions:

- Self-employment requires that the employment goal in SKIES (or its successor) be identified as “Self-Employment” and documentation that the participant is self-employed in the first, second, and third quarters after exit as indicated on the Follow-Up Plan in SKIES (or its successor).
- As outlined in the previous sections, supplemental wage data is permitted for the Adult Entered Employment and Employment Retention measures and the Youth Placement in Employment or Education measure. Supplemental wage data is not permitted for calculating the Average Earnings measure.
- All supplemental data must be documented and subject to audit. Case notes describing reasons must refer to documentation such as administrative records, Revenue or Tax records, automated database systems, participant licenses, or business-related documentation. Copies of these documents must be maintained on file for verification purposes.

4. Certificates and Credentials

4.1. Certificates Counted Toward Federal Performance Measures

Certificates reportable to DOL under the common measures policy contained in TEG 17-05 will be recorded in SKIES (or its successor) and in case files used for validation of federal reports.

The dates on which certificates or licenses are awarded need to be recorded in SKIES (or its successor). Dates are needed to determine the applicable timeframe for reporting. Certificates must be recorded in the appropriate reportable categories, which currently include:

- High School Diploma

- GED
- AA or AS Diploma/Degree
- BA or BS Diploma/Degree
- Occupational Skills License
- Occupational Skills Certificate
- Other Recognized Diploma, Degree or Certificate

Under common measure rules, the only types of reportable certificates under the category of “other recognized diplomas, degrees, or certificates” are:

- Master’s Degrees
- Doctorate Degrees
- Apprenticeship completions

Certificates provided by community or technical colleges, private career schools, and other WIA-eligible training organizations may be counted as reportable occupational skills certificates if the provider meets one of the federal common measures definitions as outlined below:

- 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.

Note: Occupational skills licenses are granted by state licensing or regulatory bodies and are required as a condition of practicing an occupation. These include, but are not limited to:

- Cosmetology licenses
- Massage licenses
- Commercial driver's licenses
- Nursing licenses.

For a list of occupations licensed by the Washington Department of Licensing, refer to <http://www.dol.wa.gov/business/professionals.html>. For a list of occupations licensed by the Washington Department of Health, refer to <http://www.doh.wa.gov/licensing/>.

Other sources of acceptable occupational skills certificates are:

- Clearinghouses of industry skill certificates being developed for use in skill assessments in vocational education, such as Vocational Technical Education Consortium of States (VTECS).
- State or regional employer skill panels that have developed skill standards, methods of testing to determine that job seekers meet those standards, and issue certificates to those meeting standards.
- Occupational Safety and Health Administration (OSHA) or Washington Industrial Safety and Health Act (WISHA) testing of operator skills for the operation of equipment.
- Certificates of training completion required by OSHA or WISHA to flaggers, fork lift operators, or other workers as a condition of performing work in an occupation.

4.2. Credentials Countable Toward State Measures of Credential Attainment

In addition to the certificates countable toward federal performance, three types of credentials are countable toward state core measures (Section 3.2) of performance:

4.2.1. Successful Completion of a Work-Based Training Plan

Successful completion of WDC-approved OJT plan is countable as a credential toward state credential rates for adult and dislocated worker populations. Successful completion of a WDC-approved Work Experience plan is countable as a credential toward state credential rates for youth populations.

Successful completion of an OJT plan means attainment of the skills the OJT plan was designed to teach, not merely employment following the end of the plan. Information necessary to document the successful completion of the plan should be maintained in case files, along with information documenting the starting and ending date of the plan. The credential date used will be the ending date of the plan.

If the OJT plan leads to skill testing that produces an occupational skills certificate meeting federal certificate definitions, there is no need to record both the occupational skills certificate and OJT completion. In such cases, only the occupational skills certificate need be recorded.

OJT is the recognized method for providing work-based training for adults and dislocated workers. According to federal WIA policy, OJT is seldom appropriate for youth. For youth, the recognized equivalent is work experience. A work experience program that includes the development and documented completion of a training plan should have a credential counted as successful completion of a work-based training plan under this policy.

Neither work experience for adults nor work experience for youth that does not have a significant training component whose results can be measured by a validated assessment count toward state federal common measure certificates or state core measure credential rates.

4.2.2. Work Readiness Credentials

Standardized, validated work readiness credentials that attest to non-technical work readiness skills needed by employers count toward state credential measures. A work readiness credential demonstrates the ability to apply situational judgment, reading, math, and communication skills in a work-related context.

The National Work Readiness Credential is one credential that meets this standard. Photocopies of work readiness credentials should be retained in case files to document attainment of this credential. The date of credential attainment should be recorded in case files and in SKIES (or its successor).

4.2.3. Credentials granted by eligible training providers licensed as private career schools by the state of Washington

A diploma, certificate or award from a program offered by a private career schools licensed by the state of Washington can be counted toward state credential rates if the diploma, certificate or award counts as a federal occupational skills certificate. If the diploma, certificate or award from a private career school licensed by the state of Washington is does not count as a federal certificate, it counts as a state credential if the program is on the state's Eligible Training Provider List (ETPL) and the occupation does not require a license. If a license is required to practice an occupation or profession (e.g., cosmetology, real estate, nursing, or massage therapy) and the ETPL program does not count as a federal occupational skills certificate, then completion of such a program does not count toward state core measures credential rates. For example, completion of an ETPL-approved program in cosmetology by an institution or organization that is not eligible to issue a certificate under the federal common measures definition would not qualify as a state core measures credential because a

student could not practice cosmetology without a license. However, attainment of the cosmetology license counts as a federal certificate (Occupational Skills License) and, therefore, as a state credential.

It should be possible to determine which of these criteria are met by reviewing the ETPL, which has information on federal financial aid status, veteran's approval, and occupational licensing requirements for a program of study. If an occupational skills license or occupational skills certificate counts toward federal performance measures because the occupation is licensed, the institution or training provider is eligible to participate in federal financial aid, or the program is approved by the Department of Veterans Affairs, the resulting certificate should be counted as a federal occupational skills license or occupational skills certificate, not as a credential provided by a private career school.

ETPL approval does not automatically mean that a program grants a credential or diploma that counts toward state core measures credential rates. Some programs on the ETPL are not licensed by the Workforce Board, Department of Licensing or equivalent regulatory agency, not eligible for federal financial aid, and not approved by the Veteran's Administration. Credentials or diplomas provided by such programs do not count toward either federal common measures certificate or state core measures credential rates.

4.3. Credentials that Do Not Count Toward Federal Common Measures Certificate Rates or State Core Measures Credential Rates

To be counted toward state core measures credential rates, a diploma, or award should:

- Have significant vocational content.
- Result from valid, objective assessment
- Be portable from one employer or region of the state to another.
- Be meaningful to employers.

To be counted, certificates and credentials should be necessary and sufficient to perform a job, not just necessary. For example, some jobs require that the holder have a non-commercial driver's license or a first-aid card. However, such ancillary credentials do not normally indicate that one is qualified to perform the job.

Credentials that do not count toward federal common measure certificate or state core measure credential rates include but are not limited to:

- First Aid Cards
- Food Handler's Cards
- Non-Commercial Driver's Licenses
- Proof of employment held subsequent to training.
- Certificates of completion for short-term intensive services
- Completion of Younger Youth Skill Goals
- Attainment of Youth Numeracy and Literacy Gains

- Completion of work experience programs for adults or dislocated workers.
- Completion of work experience programs for youth that do not contain a skill training component and assessment of results.
- Completion of programs provided by institutions and training organizations not licensed by the Workforce Board or equivalent state regulatory agency in cases where the institution or training provider is not eligible to provide federal common measures certificates as described above.

Note: Job seekers may be able to obtain countable occupational skills certificates after short-term intensive services. Occupational skills certificates, once obtained, count toward federal and state performance measures, but completion of short-term intensive services, by themselves, do not.

5. Data Integrity Standards

5.1. Real-time Data Entry

It is imperative, to the fullest extent possible, to enter the service that most accurately reflects the service provided at the time the service is provided. The following SKIES data entry requirements reflect ESD's data integrity efforts as outlined in WorkSource System Policy 1002, Revision 1:

- Services should be entered at the point in time they are delivered.
- Notwithstanding the above expectation, services entered in the SKIES Seeker Services screen must be entered within seven calendar days of service delivery and the service date should always reflect the date of service (appropriate back-dating).
- Services entered into the SKIES Services Plan screen and related program enrollments must be entered within 14 calendar days after the actual start of the service. The actual start of the service should be back-dated appropriately to reflect the beginning of service delivery.

Note: These data entry limitations do not impact follow-up services or placement information. Each WDA's local SKIES administrator (or designee/back-up) has the authority to add/edit services within one month after service delivery. Designated staff are also able to make changes when errors of fact or omission are found after the timeframes cited above.

All performance calculations and reports are designed to be customer-driven. The intent is to capture a realistic picture of participants' experiences, progress and outcomes. There is no advantage to circumventing program exit.

5.2. Accuracy of Service Entries and Use of Local Services

Not all services in SKIES (or its successor) count for performance participation. Local services do not factor into performance outcomes. Local services are intended for local use only and are to be used in conjunction with the appropriate service from the Services Catalog.

When a service is provided, the appropriate qualifying service must be identified, even if a local service and/or case notes are entered. It's important to note that:

- Qualifying services are identified in the Services Catalog (see Section 2).
- Locally defined services and follow-up services do not trigger or extend participation, nor do they factor into performance calculations.
- Services should only be entered when delivered to a customer and only actual services delivered should be entered.
- Services must be entered on a Seeker Services screen, Service Plan or Follow-up Plan.
- Case notes should support, and not contradict, service entries.
- Case notes and local services should not be entered to represent service delivery without also entering a qualifying service from the Services Catalog.

5.3. Proper use of the Follow-Up Service

5.3.1. Intent

Once participants have successfully achieved their program goals, only follow-up services should be delivered (refer to Section 1.4 for more information on new participation periods). Follow-up services delivered after goal achievement are designed to ensure job retention, wage gains, and career progress and do not count as a service that would extend participation periods.

Follow-up services respond to real customer needs and data should accurately reflect the services provided. However, TEGL 17-05 specifically excludes follow-up services from performance calculations because they are services designed to support customers following successful achievement of their program goals. Follow-up services are designed to support customers in maintaining achievements or placements.

5.3.2. Risks of Non-compliance

Delaying the exit of successfully placed participants puts local areas at risk of losing positive outcomes for Common Measures, as well as losing the timely capture of

successful participants in the federal reports. Intentionally delaying exit also increases the risk of data validation findings.

5.3.3. Guidelines

The SKIES Services Catalog previously included 10 different supportive services, but only one functioned as intended by not extending exit during follow-up. DOL allows supportive services to be provided during follow-up and a follow-up supportive service is available in SKIES (or its successor) that does not extend exit. Staff must comply with the following:

- Staff must use the FOLLOW-UP < POST-PROGRAM SUPPORT SERVICES option to reflect when such a service is given to WIA participants after exiting participation. The latest changes to support this effort include the addition of services to represent supportive services provided during program participation.
- Staff must follow the Exit guidelines outlined in Section 1.9 in conjunction with proper use of follow-up services.

6. Functional Changes to SKIES

The matrix below provides a running list of SKIES changes made in an effort to better align SKIES with data integrity efforts and policy requirements. To the extent possible, ESD intends to standardize and streamline data entry to avoid the risk of future data integrity or reporting issues. Additional changes will be announced as they are made and the matrix will be updated accordingly.

Effective Date / Change	SKIES / Reporting Function Impacted	Description of Change	Rationale
4.7.14.a 40	WIA Program Validation Screens	New fields are required to pass the program validations screens prior to updating the program status to 'participant.' The specific changes are illustrated below this matrix.	TEGL 4-13 requires SKIES application changes relating to data collection and program validation screens.
4.7.14.b 6/30/2014 42a, f.1	Service Plan Service Dates	For all point-in-time services, SKIES will automatically enter the Actual End Date to align with the entered Actual Start Date. After the change, users will not be able to modify	The 2013 Department of Labor Data Element Validation report identified that staff were keeping services open for a duration of time without actually providing a

<p>42a, f.2</p> <p>42a, f.3</p>		<p>Actual End Dates to create durations for point-in-time services.</p> <p>Duration services are limited to a specific list of services, and only two of these services are non-training services.</p> <p>A one-time process will occur to clean up the existing open ended records that do not fall within the exception criteria (i.e., services that are not 'duration' activities). The Actual End Date will default to the Actual Start Date.</p> <p>Note: Self-services in the most recent 90 days will have no impact on the logic for closing out an Actual End Date.</p>	<p>service. Keeping these services open delayed participants' exits and therefore artificially altered performance outcomes. This SKIES change, which eliminates the ability to extend exit via an open service, will require staff to input a new service each and every time it is delivered. This information will allow data validators to verify when actual service delivery occurred.</p>
<p>4.7.14.c 6/30/2014</p>	<p>Service Plan Service Dates, Training Services</p>	<p>Although certain services (mostly training related) will be allowed to have a duration entered by staff, federal reporting will ignore planned completion dates when calculating exit dates, while acknowledging Actual End Dates for the calculation.</p>	<p>Also related to DOL Data Validation Finding #1, this change will enable staff to continue managing a training plan to show training services spanning weeks or months. The planned and actual completion dates on those services will be ignored for participation purposes. Only the actual start date will count.</p>
<p>4.7.14.d 6/30/2014 43</p>	<p>Training Service Selection in the Service Plan</p>	<p>A prompt will appear each time staff select a training service in the service plan. This prompt will remind staff of WIA's sequence of services requirement and that they should ensure the participant has received an intensive service prior to inputting WIA Title I-B Adult and Dislocated Worker training services.</p>	<p>2013 DOL DEV Finding #5 indicated that staff were unaware of the sequence of services requirement and that the system should remind them to comply.</p>

The yellow highlights below indicate updates/new variables as noted in Change 4.7.14.a:

	Required element in order to save the Program Enrollment?	WIA ADULT PROGRAM	WIA DISLOCATED WORKER PROGRAM	WIA IN SCHOOL YOUTH PROGRAM	WIA OUT OF SCHOOL YOUTH PROGRAM	WIA NAFTA TAA PROGRAMS
Military Veteran	NO	X	X	X	X	X
Disability Status	YES	A	A	A	A	A*
Low Income	YES	X	X	X	X	
Campaign Served	NO	X	X	X	X	X
In School	YES	X	X	X	X	X
School Type	YES	A	A	A	A	A
High School Dropout (source base table)	YES	B	B	B	B	B

X: These are required variables

A: These variables are required where Disability Status or In School = Yes

B: This variable is required where In School = No

Note: Disability Status is currently collected from the Validation screen for TAA Programs. The update displays the value for the View Screen and the Print Report.