

**WIOA Title IB Adult, Dislocated Worker and Youth Program
Proposed Performance Standards for Program Years 2016 and 2017
Frequently Asked Questions**

On February 24, 2016, the Ohio Department of Job and Family Services (ODJFS) hosted a meeting to review proposed state levels of performance (standards) for WIOA adult, dislocated worker, and youth programs. The U.S. Department of Labor (DOL) requires each state to submit proposed performance standards (numerical goals for each performance measure) with the submission of the state's unified or combined state plan. The proposal must also include methods of arriving at the proposed standards. ODJFS invited representatives of the Governor's Office of Workforce Transformation, the Ohio Workforce Association, the Ohio Job and Family Services Director's Association, and the County Commissioners Association of Ohio for purposes of explaining the performance measures, the calculation of the outcomes, the participants who exit and count in each of the measures, and the timeframes of the exiters used in each program year. ODJFS sought input about the methods the agency used to analyze past data in order to craft credible and realistic proposed performance standards. The agency also sought input on the standards proposed, based on that analysis.

This document provides a synopsis of questions posed and answers provided. It also reflects ODJFS' commitment to communicate all information in a timely fashion, in an effort to stimulate dialogue and communication between and among all dedicated and interested parties.

Q: How did ODJFS determine what standards to propose for the adult and dislocated worker standards?

A: For the adult and dislocated worker proposed performance standards, ODJFS used the new WIOA definitions and timeframes for performance and calculated what Ohio's performance outcomes would have been for past program exiters.

Q: How did ODJFS determine what standards to propose for the youth standards?

A: For the youth standards, Ohio used data in addition to the TANF recipients who were served by WIA, because those numbers were low. ODJFS received information about TANF recipients for five years who match the CCMEP age group and used Unemployment Insurance wage records to determine their employment and earnings for the same time period as will be measured in WIOA. Since the CCMEP program is new, the program participants are expected to require additional services to overcome potential barriers to employment and education, and the capacity of service providers is still being expanded to serve this population, the proposed standards were set at the lowest outcome for any of the five years. This can be viewed as a baseline to build on, and standards will be increased to ensure quality services are provided, participants are employed or enrolled in post-secondary education or training and earning wages that lead to self-sufficiency.

Meeting attendees expressed a general consensus that initial negotiated rates should be quite low. Audience participants recognize that there are limits to what USDOL will accept, but feel as though there are too many unknowns to push negotiated rates high. Consensus was expressed that workforce professionals should communicate and develop well-reasoned, rational arguments in favor of initially low rates, recognizing that USDOL statistical model may contradict Ohio's assumptions.

Q: What participants will count in the Youth Employed or In Education/Occupational Skills Training?

A: Dan Rizo-Patron (ODJFS Performance Manager) confirmed that all Youth Participants (WIOA and/or OWF/TANF) that participate and exit program will be included in the measure (denominator). If participant's exit is successful - employed 2nd quarter post-exit and/or enrolled in post-secondary education/training – they will be in numerator. The same would hold true for participants who would be measured once again – employed 4th quarter post-exit and/or enrolled in post-secondary education/training.

Q: Did ODJFS account for the change from an average wage to a median wage:

A: Yes, ODFS analyzed past data using the new definition for wage standards. WIOA measures and reports performance on the median participant wage in contrast to WIA and its calculation of the average. It is expected that median participant wages will be lower than the previous average wage performance measures, simply because the median is not affected by the 'pull' of statistical outliers. Additionally, Ohio is evaluating its former 'in-place' rules for calculating the average by constraining wages on the upper and lower end of the wage spectrum. The upper and lower range of quarterly wages may still be constrained to eliminate statistical anomalies, but the methodology will be improved.

Q: Does supplemental information count when calculating employment and earnings outcomes? Recognizing that some performance measures are tied to wage record collection and participant employment matching, concern was expressed about situations where unemployment insurance wage records and locally collected employment records do not correspond.

A: Locally collected wage information collected from an exited, employed participant will not be accepted by the USDOL in calculating median earnings. However, it will be used as evidence for success in the employed 2nd quarter and/or employed 4th quarter after exit measures if it is entered in the workforce case management system (WCMS).

Q: Does the Measurable Skill Gains standard apply to all programs?

A: The Measureable Skill Gains standard is applicable to ABLE only for the first two Program Years. Nonetheless, local areas will need to collect data and evaluate results for future evaluative standard performance measure.

Q: How does when a participant exits the program factor into when that exiter's outcomes are measured?

A: Clear guidance was provided indicating that the quarter of Participant Exit, whether successful or not, is the quarter that determines when performance measurement starts. A CCMEP Performance Measure Cohorts chart indicating date of Exit quarter and when performance measurement is calculated is attached to this FAQs document.

Q: How will CCMEP/OWF Youth Participant Performance impact CCMEP Sanction Policies? – Audience members were noticeably anxious about the implementation of sanction policies if negotiated performance targets are not achieved.

A: Sanction policies are not yet available; but will be later in the year. Once sanction policies are released, they will be submitted for public comment – providing the workforce professional community with an opportunity to weigh in on sanction language and eventual implementation.

Q: Why does the CCMEP Employer Retention Measure only count employment with the same employer, as opposed to any employer (like the WIOA employment measures)? Sometimes a youth or young adult gets a better job with a different employer, so the measure may not capture employment success.

A: The Employer Retention is intended to measure employer satisfaction. Employers are in need of skilled workers who are retained with that employer

Q: Are all existing WIA/WIOA Youth to be transferred to CCMEP Youth program July 1, 2016?

A: Yes, that is the planned transition process.

Q: How will local areas and counties approach negotiating WIOA and CCMEP performance standards with the state?

A: With deadlines fast approaching, general consensus formed at the meeting on February 24 about the negotiation process for local areas and counties. The consensus included the following action steps and items:

(1) ODJFS, in partnership with Ohio's Workforce Association's membership, will develop and utilize several platforms upon which WIOA and CCMEP questions, issues and solutions be addressed.

(2) Meeting attendees were asked to carefully read through the documentation handed out and provide comment by 2/26/2016. Commenters can also respond when the performance standards are published for public comment with the Combined State Plan within the next week.

(3) One meeting attendee commented that proposed negotiation rates/targets must be logical and rooted in the contextual environment that workforce professionals operate. Mr. Sernik also reminded audience that if proposed performance targets fall short, failures will be published and elected officials may suffer the consequences of failure in the ballot box – that is why it is imperative to get the proposed level correct. Dan reassured assembled audience, that ODJFS is trying to establish attainable targets.

(4) County commissioners will need to convene and determine who on their staff is best positioned to appreciate the complexities inherent in the negotiations, stimulate and facilitate bi-lateral communication between locals and ODJFS and finally, offer expertise and broker performance targets that are realistic, achievable and reflect Ohio's workforce professional's commitment to serving Ohioans, addressing the needs of Ohio employers, and building and expanding Ohio's dynamic economy.

(5) Taking into consideration the meeting's comments and discussion, many meeting attendees articulated that with all of the impending changes (programmatic, systematic and demographic) that performance negotiations may need to be turned upside down. Specifically, quite possibly counties should educate local workforce areas with respect to the demographic characteristics potentially driving future performance metrics.

(6) Another area of major concern expressed by audience members was that creating local Lead Agency status at the county level may create the potential for 88 individual counties may request separate performance negotiations. If this proves to be the case, the negotiation period may require considerable extension.

(7) ODJFS is working on guidance on how and when negotiating WIOA standards will occur for the Workforce Development Agencies and CCMEP standards for the county lead agencies and will be mindful of suggestions and concerns from meeting attendees.

Q: How will successful WIOA performance be determined?

A: USDOL's current guidance is as follows: using the following table, first calculate the percent of Target for each individual measure (e.g., if the target for a measure is 80 percent, and the state attains 85 percent for the measure, then the state attained 106.3 percent of the target). Then average the percentages of Targets in 2 ways: 1) By Program (e.g., all 6 measures for Title I Adult); 2) By Measure (e.g., each of the 6 Median Earnings results averaged together). A Performance Failure occurs if: 1) State does not achieve at least an average 90% of Target on any Program's measures; 2) State does not achieve at least an average 90% of Target on any Measure; 3) State does not achieve at least 50% of target on any single, individual measure. NOTE: the grayed out cells in the table below indicate that for PY 2016 and PY 2017, these primary measures will not count towards performance. Data will be collected in order to establish a baseline to use in establishing targets for PY 2018 and beyond. For the blacked out cells, data will not be collected for these measures and will not count towards performance.

Indicator / Program	Title II Adult Education	Title IV Rehabilitative Services	Title I Adults	Title I Dislocated Workers	Title I Youth	Title III Wagner-Peyser	Average Indicator Score
Employment 2nd Quarter After Exit							
Employment 4th Quarter After Exit							
Median Earnings 2nd Quarter After Exit							
Credential Attainment Rate							
Measurable Skills Gain							
Effectiveness in Serving Employers							
Average Program Score							

Q: How will successful CCMEP performance success be determined?

A: ODJFS is currently working on guidance for establishing CCMEP performance measures' success.

Q: Where and when will additional information be provided?

A: There are several key upcoming dates of interest – (1) March 9, 2016 – Doug Lumpkin (OHSI) will address workforce professional on Lead Agency selection best practices, (2) April 19, 2016 – OSHI is Hosting a Webinar to field questions and provide clarification of outstanding issues, (3) TBD – Web-based training tailored to level the field for CCMEP implementation, followed by in-depth regional and local training. At this point in time, the basic implementation roadmap is: (1) County Commissioner Training on Lead Agency Selection, (2) WIOA/TANF/CCMEP Communication, (3) Fiscal System change(s), (4) Ohio Means Jobs (OMJ) and OWCMS change(s) and training.