

Attachment 8: Reentry Employment Opportunities

I. Introduction

This attachment describes the program specific details of the performance accountability guidance for Reentry Employment Opportunities (REO) grantees. Please note that the Department of Labor (Department, or DOL) has made a concerted effort to align the performance accountability guidance of its various workforce programs. The Department is requiring REO grants with a start date of July 1, 2017 and later to align with Workforce Innovation and Opportunity Act (WIOA) and to track and report on the six WIOA primary indicators of performance, as set forth in WIOA section 116(b)(2) and as further specified below. This attachment therefore describes the convergence of the REO program's performance accountability measures with the WIOA measures, and also highlights areas where REO differs from the shared DOL performance guidance described in the main body and appendices of this Training and Employment Guidance Letter (TEGL). Note that references in this attachment to section numbers of this guidance refer readers to the main body of the TEGL.

This attachment provides performance reporting guidance unique to REO grants with periods of performance start dates of July 1, 2017 and later.

II. Differences from Shared Guidance

1. Primary Indicators of Performance.

REO grant performance outcome measures will be established using the data collected through the WIOA DOL-only Participant Individual Record Layout (DOL-only PIRL) for the six WIOA primary indicators of performance. All REO grantees are required, as outlined in their grant's Funding Opportunity Announcement and grant award, to report participant level data for all individuals served using grant funds, in alignment with the WIOA indicators. Appendix I to this guidance defines these indicators, as well as their methodology and operational parameters.

A. Employment Rate – 2nd Quarter After Exit:

REO-Adult programs (programs falling into the REO-Adult category are identified as such in each governing FOA) will follow the WIOA title I Adult indicator: The percentage of participants who are in unsubsidized employment during the second quarter after exit from the program.

A-1. Youth Education and Employment Rate – 2nd Quarter After Exit:

REO-Youth programs (programs falling into the REO-Youth category are identified as such in each governing FOA) will follow the WIOA title I Youth indicator: The percentage of participants in education or training activities or in unsubsidized employment during the second quarter after exit.

REO-Adult and REO-Youth programs apply these indicators as they are described in Appendix I to this TEGL, with the operating parameters and methodology described therein.

B. Employment Rate – 4th Quarter After Exit:

REO-Adult programs will follow the WIOA title I Adult indicator: The percentage of participants who are in unsubsidized employment during the fourth quarter after exit from the program.

B-1. Youth Education and Employment Rate – 4th Quarter After Exit:

REO-Youth programs will follow the WIOA Title I Youth indicator: The percentage of participants in education or training activities or in unsubsidized employment during the fourth quarter after exit.

REO-Adult and REO-Youth programs apply these indicators as they are described in Appendix I to this TEGL, with the operating parameters and methodology described therein.

C. Median Earnings – 2nd Quarter After Exit: The median earnings of participants who are in unsubsidized employment during the second quarter after exit from the program.

Both REO-Adult and REO-Youth programs apply this indicator as it is described in Appendix I to this TEGL, with the operating parameters and methodology described therein.

D. Credential Attainment: The percentage of those participants enrolled in an education or training program (excluding those in on-the-job training (OJT) and customized training) who attain a recognized postsecondary credential or a secondary school diploma, or its recognized equivalent, during participation in or within one year after exit from the program. A participant who has attained a secondary school diploma or its recognized equivalent is included in the percentage of participants who have attained a secondary school diploma or its recognized equivalent only if the participant also is employed or is enrolled in an education or training program leading to a recognized postsecondary credential within one year after exit from the program.

Both REO-Adult and REO-Youth programs apply this indicator as it is described in Appendix I to this TEGL, aligning with the WIOA Adult and Youth programs respectively, with the operating parameters and methodology described therein.¹

¹ ETA may consider additional related indicators in evaluating grantee performance, which will be defined in the FOA, but this definition of credential attainment will be the one used in the QPR that grantees will certify in their WIPS submissions.

- E. Measurable Skill Gains:** The percentage of program participants who, during a program year, are in an education or training program that leads to a recognized postsecondary credential or employment and who are achieving measurable skill gains, defined as documented academic, technical, occupational, or other forms of progress, towards such a credential or employment.

Both REO-Adult and REO-Youth programs apply this indicator as it is described in Appendix I to this TEGL, aligning to the WIOA Adult and Youth programs respectively, with the operating parameters and methodology described therein.

- F. Effectiveness in Serving Employers:** The percentage of program participants who exit and are employed with the same employer in the second and fourth quarters after exit.

Both REO-Adult and REO-Youth programs apply this indicator as it is described in Appendix I to this guidance, with the operating parameters and methodology described therein.

2. Categories of Enrollment: Participant and Date of Program Exit

- A. Reportable Individual:** This does not apply to REO programs.

- B. Participant:** Satisfaction of all applicable program requirements for the provision of services, including eligibility determination and entering into a core service, is what makes an individual a participant in REO programs. REO defines what qualifies as a core services through technical assistance to grantees.

- C. Exit:** The date of exit from the program is the last date of a core service. A core service is any service other than a supportive service. Supportive services do not prevent exit. Specifically:

- The date of exit cannot be determined until 90 days have elapsed since the participant last received any core services; furthermore, there must be no future planned service scheduled to provide the participant with future core services. At that point, the date of exit is applied retroactively to the last date of a core service.
- For determining whether 90 days have elapsed since the participant last received core services, receipt by the participant of any supportive services or follow-up services, do not delay, postpone, or affect the date of exit. Because the date of exit is retroactive to the last date of a core service, follow-up services may begin immediately following the last date of a core service if it is expected that the participant will not receive any future core services. Provision of follow-up services does not extend the date of exit.
- PIRL data element 901 (Date of Program Exit) is used to collect and report the date of exit. For exit-based performance measures, the quarter for collecting follow-up data is determined by the quarter in which the date of exit occurs. For example, if the date of

exit is between January 1st and March 31st, the first quarter after exit would be April 1st through June 30th.

In addition to the above requirements, the following applies to **both REO-Adult and REO-Youth Programs** – Exited participants may return to active status to receive additional core services. When exited participants are reactivated, the follow-up period will be reset to the new date of exit. Any follow-up data, including post-exit outcomes, is deleted and must be re-collected appropriate to the new date of exit, when it occurs. Additionally, when exited participants are reactivated, they do not start a new period of participation; instead, their periods of participation are extended.

- D. Common Exit:** As stated in Section 7 of this TEGl, while the Department encourages states that implement common exit policies to also include DOL-administered non-core programs within the scope of the state’s common exit policy, the Department also recognizes that the decision of whether to retain or develop a common exit policy is ultimately left to the States, as well as which (if any) DOL-administered non-core programs to include within the scope of the policy. This is subject to the requirements for common exit stated in Section 7 of this TEGl. Grantees should be aware that co-enrollment without common exit may result in multiple exit dates, based on the unique exit dates within each program for co-enrolled participants. If a state has a common exit policy that includes REO, then a REO participant will not exit until the last date of service of any program included in the common exit policy.

3. Self-Service and Information-Only Activities

This does not apply to REO programs.

4. Period of Participation

REO-Adult programs and **REO-Youth programs** adopt the definition “period of participation” as stated in Section 9 of this TEGl except for in the circumstance described above in which an exited participant returns to the same program and has his/her exit removed (see section 2.C. of this attachment).

Reporting Unique Participants

REO reports participant counts by enrollment. Therefore, while the count by grantee will be mostly unique, there may be cases where a participant enrolls twice during the period of performance. Please note, REO-Youth participants in exit status who return to active status by extending their periods of participation (as described above in section 2.C. of this attachment) do not qualify as new enrollments.

5. Workforce Integrated Performance System (WIPS) and How to Functionally Report

REO grants with a start date of July 1, 2017, and later will report through WIPS. To do so, grantees will record participant data in a DOL-provided web-based case management system currently under development. In the interim, until this case management system is available,

grantees are still required to collect all of the applicable PIRL data elements on the REO PIRL schema. Grantees will collect the applicable data in a PIRL-based Access database tool that would allow for the capturing of applicable primary indicators of performance and allow grantees to become familiar with the collection of the WIOA required elements and indicators. Grantees that have already begun reporting through either the Prisoner Reentry Initiative or Youth Offender case management systems will continue reporting through the appropriate system until the completion of that grant. REO grants with a start date of July 1, 2017, will report through the PIRL-Based Access database tool until the case management system, currently under development, is available.

6. State Annual Narrative Reports

This does not apply to REO programs.

7. Eligible Training Provider (ETP) Performance Reporting

This does not apply to REO programs.

8. Pay-for-Performance Reporting

This does not apply to REO programs.

9. Quarterly Narrative Reports for Discretionary Programs

REO grantees are required to use the *Joint Quarterly Narrative Report Template* (ETA-9179) for quarterly performance narrative reporting. This form was approved for use by the Office of Management and Budget (OMB) under OMB control no. 1205-0448. Additional instructions for completing this form and submitting it to the Department will be included in separate guidance.

10. Use of Social Security Numbers and Direct Wage Match for Performance Reporting

In accordance with Section 15 of this TEGL, REO grantees are directed to request participants' Social Security numbers (SSNs). While REO grantees are required to request participant SSNs, participants cannot be denied services if they choose to not disclose an SSN.

As described in Section 15 of this TEGL, the Department will facilitate the acquisition of aggregate quarterly employment and earnings results for REO program participants, and provide those aggregate results to the relevant grantee. In particular, the Department will match UI quarterly wage records on behalf of grantees in order to capture exit-based outcomes (each of which has an employment-related component) for participants who have exited the program for following indicators only:

- A. Employment Rate – 2nd Quarter After Exit;
- B. Employment Rate – 4th Quarter After Exit;

- C. Median Earnings – 2nd Quarter After Exit;
- D. Credential Attainment (Secondary School Diploma or Recognized Equivalent); and
- E. Effectiveness in Serving Employers – 2nd and 4th Quarter After Exit Retention with the Same Employer.

The Department will calculate these specific exit-based outcomes on behalf of grantees, using SSNs provided for each REO participant as part of the information included in each grantee's WIPS quarterly participant-level data file submission.

However, wage records do not reflect the employment outcomes for all participants who have exited a REO program and successfully obtained employment. Wage record data is limited to information reported quarterly by those employers that are required to report employees' earnings to the state employment security agency that manages the state's unemployment compensation program. Employment outcomes for an individual who is self-employed or who works as an independent contractor are not found in the wage records. For such individuals, or for those that do not provide an SSN, supplemental wage information, as described below, is the only means for reporting on exit-based participant outcomes.

Furthermore, as a result of a two-quarter lag in the availability of wage record data, grantees receive aggregate results on their participants' outcomes, grantees are not able to analyze the aggregate report to determine which participants are individuals for whom wage record data was available and which are not. Instead, it is prudent for grantees to collect supplemental wage information for exited participants, especially those for whom wage records are unlikely to be available, as the Department will be able to integrate supplemental wage information regarding a participant on the PIRL-based Access data elements with the wage record information to obtain aggregate employment and earnings outcomes in WIPS on quarterly performance reports.

11. Supplemental Wage Information

As described in Section 16 and Appendix VI of this TEGl, REO grantees may collect and use supplemental wage information to calculate the exit-based primary indicators of performance. Supplemental wage information is the only means for grantees to report exit-based outcomes for those participants who do not provide SSNs, and frequently the only means to report such outcomes for participants for whom wage record data is not predicted to be available. Additional details regarding circumstances for collecting supplemental wage information, and methods and procedures for doing so, is provided in Appendix VI of this TEGl.

The collection and use of supplemental wage information is subject to the following limitation: a REO grantee's ability to report on these indicators via supplemental wage information is limited by the follow-up period in the FOA for its grants. The FOAs for many REO grants limit the follow-up period to nine (9) months (or fewer) after exit for each participant. Grantees with such limitations on the follow-up period will not be able to report employment outcomes for the fourth quarter after exit via supplemental wage information, as the time period for reporting would fall outside of the follow-up period defined in the grant

period of performance. Grant resources may not be expended for collecting supplemental wage information or other performance information after the follow-up period has concluded. ETA will be able to determine whether it would have been possible for an REO grantee to have collected supplemental wage information on a given participant based on the date of program exit. Grantees should also refer to their FOAs to determine if they have nine-month limitations for the follow-up period, which will determine whether they are able to report this measure through supplemental wage information.

Likewise, the credential attainment indicator reflects credentials earned during participation or up to one year following exit from the program. A grantee with a follow-up period limited to nine (9) months (or fewer) would not be able to report on any credentials earned following the conclusion of the grantee’s follow-up period (e.g., if a participant exits a program in January, and the follow-up period defined in the period of performance for the particular grant concludes in September of that year, the grantee would be unable to record any credentials earned by that participant in October, November, or December).

III. Unique Features of REO

Below is a table that provides additional useful information for REO grantees about how different REO services are to be reported through the DOL-only PIRL. It includes information about the PIRL data element numbers, associated codes, and clarification on whether the receipt of such services delays the date of exit or not.

Service Type	Applicable PIRL Data Element Number (s)	PIRL Data Element Code Value(s)	Does this service prevent exit?
Education Services	1332: Participated in Postsecondary Education During Program Participation	1 = Yes, Participated in Postsecondary Education 0 = No, Did Not Participate in Postsecondary Education	Yes
	1402: Most Recent Date Received Educational Achievement Services	YYYYMMDD	Yes
	1403: Most Recent Date Received Alternative Secondary School Services		
	1405: Most Recent Date Received Work Experience Opportunities		
	1407: Most Recent Date Received Education Offered Concurrently with Workforce Preparation		
	1415: Most Recent Date Youth Received Postsecondary transition and preparatory activities		
Training Services	1300: Received Training	1 = Yes 0 = No	Yes

Service Type	Applicable PIRL Data Element Number (s)	PIRL Data Element Code Value(s)	Does this service prevent exit?
	1306: Occupational Skills Training Code #1	00000000	Yes
	1311: Occupational Skills Training Code #2		
	1316: Occupational Skills Training Code #3		
	1307: Training Completed #1	1 = Yes 0 = No	Yes
	1312: Training Completed #2		
	1317: Training Completed #3		
	1302: Date Entered Training #1	YYYYMMDD	Yes
	1309: Date Entered Training #2		
	1314: Date Entered Training #3		
	1308: Date Completed, or Withdrew from, Training #1	YYYYMMDD	Yes
	1313: Date Completed, or Withdrew from, Training #2		
	1318: Date Completed, or Withdrew from, Training #3		
	1303: Type of Training Service #1	01 = On the Job Training 02 = Skill Upgrading 03 = Entrepreneurial Training (non-WIOA Youth) 04 = ABE or ESL (contextualized or other) in conjunction with Training (non-TAA funded) 05 = Customized Training 06 = Other Occupational Skills Training 07 = Remedial Training (ABE/ESL – TAA only) 08 = Prerequisite Training 09 = Registered Apprenticeship 10 = Youth Occupational Skills Training 11 = Other Non-Occupational-Skills Training 00 = No Training Service	Yes
1310: Type of Training Service #2			
1315: Type of Training Service #3			
Workforce Preparation Activities	1004: Date of Most Recent Career Service (WIOA)	YYYYMMDD	Yes
	1102: Most Recent Date Received Staff-Assisted Career Guidance Services		

Service Type	Applicable PIRL Data Element Number (s)	PIRL Data Element Code Value(s)	Does this service prevent exit?
	1103: Most Recent Date Received Workforce Information Services		
	1104: Most Recent Date Received Staff Assisted Job Search Activities		
	1105: Most Recent Date Referred to Employment		
	1116: Most Recent Date Received Staff-Assisted Basic Career Services (Other)		
	1200: Date of First Individualized Career Service		
	1201: Most Recent Date Received Individualized Career Service		
	1210: Received Pre-Vocational Activities		
	1408: Most Recent Date Received Leadership Development Opportunities		
Community Involvement Activities	1408: Most Recent Date Received Leadership Development Opportunities	YYYYMMDD	Yes
Mentoring Activities	1410: Most Recent Date received Adult Mentoring Services	YYYYMMDD	Yes
Health Services	1411: Most Recent Date Received Comprehensive Guidance/Counseling Services	YYYYMMDD	Yes
Supportive Services	1409: Most Recent Date Received Supportive Services	YYYYMMDD	No
	1500: Received Needs-Related Payments	1 = Yes 0 = No	