EMPLOYMENT AND TRAINING ADMINISTRATION ADVISORY SYSTEM U.S. DEPARTMENT OF LABOR Washington, D.C. 20210	CLASSIFICATION WIA/Performance Reporting CORRESPONDENCE SYMBOL PROTECH DATE April 15, 2005

TRAINING AND EMPLOYMENT GUIDANCE LETTER NO. 28-04

TO: ALL STATE WORKFORCE AGENCIES
ALL STATE WORKFORCE LIAISONS

FROM: EMILY STOVER DeROCCO
Assistant Secretary

SUBJECT: Common Measures Policy

1. Purpose. To inform states and grantees of the Employment and Training Administration's (ETA) revised policy on common performance measures for Federal job training and employment programs, and rescind Training and Employment Guidance Letter (TEGL) 15-03.

2. References. President's Management Agenda, http://www.whitehouse.gov/omb/budintegration/pma_index.html; OMB Director's Memorandum M-02-06, http://www.whitehouse.gov/omb/budintegration/common.html; TEGL No. 15-03, "Common Measures Policy"; and TEGL No. 18-04, "Announcing the Soon-to-be-published Proposed Revisions to Existing Performance Reporting Requirements for the Implementation of Common Measures for Title I of the Workforce Investment Act (WIA), the Wagner-Peyser Act (Employment Service/Labor Exchange), the Trade Adjustment Assistance Reform Act (TAA), and Title 38, Chapter 41 Job Counseling, Training, and Placement Service (Veterans' Employment and Training Service)."

3. Background. This document rescinds and replaces the common measures policy outlined in TEGL 15-03. ETA's statutory and regulatory authority to administer job training and employment programs includes provisions allowing for the requirement of performance reporting from states and grantees. In 2001, the President announced a Management Agenda to improve the management and performance of the Federal government. One of the five government-wide goals, budget and performance integration, emphasizes program effectiveness. As part of the President's budget and performance integration initiative, the Office of Management and Budget (OMB) and other Federal agencies developed performance measures for certain programs with similar goals. OMB Director's Memorandum M-02-06 and subsequent documents from OMB outline broad indicators of performance for job training and employment programs.

The common measures are an integral part of ETA's performance accountability system. The value of implementing common measures is the ability to describe in a similar manner the core purposes of the workforce system—how many people found jobs; did people stay employed; and did their earnings increase. Multiple sets of performance measures have burdened states and grantees as they are required to report performance outcomes based on varying definitions and methodologies. By minimizing the

RESCISSIONS TEGL 15-03	EXPIRATION DATE Continuing

different reporting and performance requirements, common performance measures can 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.

The workforce investment system is also being transformed to a demand-driven system with strategic investments in workforce solutions that result in more individuals being trained for high-skill jobs in high-growth, high-demand industries. The performance accountability system, with common performance measures at its core, needs to be aligned with the specific demand-driven strategies identified both at the state and local levels. The demand-driven approach may require unique approaches to training and service delivery. It may require shorter and targeted training in some cases and longer term training in others, depending on the specific skills and credentials identified as necessary by industry – both at entry level and as individuals' progress up and across career lattices. In all cases, the focus continues to be on connecting employers with skilled workers, and connecting workers with good jobs, as reflected in the common performance measures. To minimize burden on states and local areas, as ETA programs are reauthorized, we will work to ensure that statutory performance measures are consistent with these common measures.

Three common measures apply to programs serving adults and three common measures apply to programs serving youth:

Adult Measures
- Entered Employment
- Employment Retention
- Earnings Increase

Youth Measures
- Placement in Employment or Education
- Attainment of a Degree or Certificate
- Literacy and Numeracy Gains

Although program efficiency was identified as a common measure for Federal job training and employment programs in TEGL 15-03, ETA has revised its policy and will not require states and grantees to report on this measure. Instead, ETA will use existing program management data to report program efficiency at a national level to OMB.

Programs administered by six Federal agencies – the Departments of Labor, Education, Health and Human Services, Veterans Affairs, Interior, and Housing and Urban Development – are subject to the common measures. Attachment A contains a list of Federal programs outside of ETA impacted by the common measures. It is important to note that this policy guidance applies to Department of Labor funded programs only.

These measures provide only part of the information necessary to effectively oversee the workforce investment system. ETA will continue to collect from states and grantees data on program activities, participants, and outcomes that are necessary for program management and to convey full and accurate information on the performance of workforce programs to policy-makers and stakeholders.

This guidance includes the following sections:

Section 4: Program Participation and Exit	Page 4
Section 5: ETA Common Measures Policy	Page 7
Section 6: Data Sources	Page 16
Attachment A: Federal Job Training and Employment Programs Impacted by Common Measures	Page 20
Attachment B: Common Measures At-A-Glance	Page 21
Attachment C: Definitions of Key Terms	Page 22
Attachment D: Educational Functioning Level Descriptors	Page 25

4. Program Participation and Exit

A. Point of Program Participation for Reporting

What is the definition of a participant?

The term participant means an individual who is determined eligible to participate in the program and receives a service funded by the program in a physical location (e.g., a One-Stop career center). States and grantees are encouraged to consider as participants those individuals who receive services that are available electronically and are not accessed through a physical location.

Operational Parameters:

- The criteria that are used to determine whether an individual is eligible to participate will be based on the guidelines for the program.
- The term "service" does not include a determination of eligibility to participate in the program, self-directed job search that does not result in a referral to a job, services and activities specifically provided as follow-up services or regular contact with the participant or employer to only obtain information regarding his/her employment status, educational progress, need for additional services, or income support payments (except for trade readjustment allowances and other needs-related payments funded through the TAA program or National Emergency Grants (NEGs)).
- Individuals who visit a physical location for reasons other than its intended purpose (e.g., use of restrooms or ask staff for directions) are not participants.

Discussion:
Many states have already developed data management systems capable of tracking core self-service and informational activities that individuals access remotely by collecting personally identifiable data and other basic contact information. ETA encourages all states to develop such capabilities so that sufficient program management data will be available to provide the Administration, Congress, and our stakeholders with a more complete and accurate picture on the levels of participation and types of services being provided through the nation's workforce investment system.

When does program participation occur?

Following a determination of eligibility, participation in a program commences when the individual begins receiving a service funded by the program. This phrase has the same meaning as the "date of participation" used in some of the measures.

Which participants count in the common measures?

Generally, all participants will be taken into account when computing performance under the common measures. However, there are two situations where participants may not be included in the measures. First, because the employment-related measures require grantees to match personally identifiable client records with wage records, grantees may exclude those participants who do not voluntarily disclose valid social security numbers. Second, there may be some circumstances in which certain participants may not be included in one or more of the common measures because they are specifically excluded from performance measurement in the underlying program. For instance, WIA section 136(b)(2)(A) and 20 CFR 666.140, specifically state, "the core indicators of performance apply to all individuals registered for the Adult and Dislocated Worker programs, except for those individuals who participate exclusively in self-service or informational activities." WIA participants covered by this exception will not be taken into account in the common measures. However, as part of WIA reauthorization, the Administration is proposing to remove this exception. Under current requirements, states have the authority to voluntarily submit performance information on all WIA participants in order to provide a more comprehensive picture of service delivery.

B. Point of Exit for Reporting

What is the definition of program exit?

The term program exit means a participant does not receive a service funded by the program or funded by a partner program for 90 consecutive calendar days and is not scheduled for future services.

Operational Parameters:

- The term "service" does not include a determination of eligibility to participate in the program, self-directed job search that does not result in a referral to a job, services and activities specifically provided as follow-up services or regular contact with the participant or employer to only obtain information regarding his/her employment status, educational progress, need for additional services, or income support payments (except for trade readjustment allowances and other needs-related payments funded through the TAA program or NEGs).
- Grantees that use services provided by partner programs to extend the point of exit must have the capacity to track program participants until the individual exits all services funded by the program or the partner program.
- The phrase "and is not scheduled for future services" does not apply to participants who voluntarily withdraw or dropout from the program. In these circumstances, once a participant has not received any services funded by the program or a partner program for 90 consecutive calendar days and has no planned gap in service, the date of exit is applied retroactively to the last day on which the individual received a service funded by the program or a partner program.

Discussion:
To encourage service integration and recognize shared contributions toward performance outcomes, workforce programs can share accountability under the common measures when the participant has exited all services funded by the program or funded by a partner program. Some methods for tracking participants across programs include specifying services financially assisted by partner programs in the individuals' service plans, coordinating service tracking through integrated data systems or other technologies, and providing coordinated follow-up services to individuals.

Are there any exceptions to the definition of exit?

Participants should not be considered as exited if there is a planned gap in service of greater than 90 days in one of the following circumstances:

- Delay before the beginning of training
- Health/medical condition or providing care for a family member with a health/medical condition
- Temporary move from the area that prevents the individual from participating in services

Grantees must document any gap in service that occurs and indicate the reason for the gap in service.

When does exit from the program occur?

Once a participant has not received any services funded by the program or a partner program for 90 consecutive calendar days and has no planned gap in service and is not scheduled for future services, the date of exit is applied retroactively to the last day on which the individual received a service funded by the program or a partner program.

C. Excluding Participants from the Common Measures

Occasionally, circumstances arise that are beyond the control of both the participant and the program. The intent here is to identify a common list of specific reasons as to why a participant can be excluded from common measures calculations. Participants in the following categories, either at the time of exit or during the three-quarter measurement period following the exit quarter, will be excluded from the computation of the measures:

- *Institutionalized* – The participant is residing in an institution or facility providing 24-hour support, such as a prison or hospital, and is expected to remain in that institution for at least 90 days. Individuals with disabilities (as defined in 29 CFR 37.4) residing in institutions, nursing homes, or other residential environments cannot be excluded under this reason. This reason does not apply to the Responsible Reintegration of Youthful Offenders program.

- *Health/Medical or Family Care* – The participant is receiving medical treatment or providing care for a family member that precludes entry into unsubsidized employment or continued participation in the program. This does not include temporary conditions or situations expected to last for less than 90 days.
- *Deceased* – Self-explanatory.
- *Reservists Called to Active Duty* – The participant is a reservist who is called to active duty for at least 90 days.
- *Relocated to a Mandated Residential Program* – For youth participants only, the participant is in the foster care system or any other mandated residential program and has moved from the area as part of such a program.

Grantees must fully document any reason that excludes the participant from common measures calculations.

5. Employment and Training Administration Common Measures Policy. All programs administered by ETA will be subject to the common measures policy. Designation that a program is subject to the adult and/or youth measures will be implemented through modifications to each program's reporting and recordkeeping system and in no way impacts the existing age eligibility requirements of the program.

The remainder of this Section describes the methodologies and important operational parameters of the measures. Definitions of key terms for the measures can be found under Attachment C to further clarify details needed to implement the measures. The adult common measures are discussed in Part B of this Section, and the youth measures are addressed in Part C. The data sources and methods that grantees are authorized to use when calculating the common measures are explained in Section 6 of this document.

A. Introduction to Common Measure Methodologies

The methodologies of the common measures are written as an equation, clearly identifying who is in the numerator and who is in the denominator. In cases where there are conditions that apply to both the numerator and denominator, the condition is represented in italics at the beginning of the measure. For example, the adult entered employment rate is defined as:

Of those who are not employed at the date of participation:
The number of adults who are employed in the first quarter after the exit quarter divided by the number of adults who exit during the quarter

The condition "of those not employed at the date of participation" applies to both the numerator and denominator as follows: the number of adults who *are not employed at the date of participation* and are employed in the first quarter after the exit quarter divided by the number of adults who *are not employed at the date of participation* and exit during the quarter. In addition, the phrase "who exit during the

quarter" is used frequently in the denominators of the measures. This phrase has the same meaning as the term "exit quarter" used in some of the numerators.

The definitions of other key terms used in the common measure methodologies may be found in Attachment C.

B. Adult Measures

Entered Employment

Methodology:

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

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

Operational Parameters:

- 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, have either received a notice of termination of employment or the employer has issued a Worker Adjustment and Retraining Notification (WARN) or other notice that the facility or enterprise will close, or are currently on active military duty and have been provided with a date of separation from military service are considered not employed and are included in the measure.
- Employment at the date of participation is based on information collected from the individual, not from wage records.

Discussion:

This measure provides an assessment of program impact in increasing employment for those who were unemployed. ETA recognizes concerns that have been raised concerning the exclusion of individuals who are employed at the date of participation from this measure. However, including individuals with jobs at program entry is not fully consistent with the concept of an entered employment indicator. The positive impact of services provided to incumbent workers and the underemployed can be demonstrated in both the retention and earnings measures.

Employment Retention

Methodology:
Of those who are employed in the first quarter after the exit quarter:
The number of participants who are employed in both the second and third quarters after the exit quarter divided by the number of participants who exit during the quarter.

Operational Parameters:
- This measure includes only those who are employed in the first quarter after the exit quarter (regardless of their employment status at participation).
- 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.

Discussion:
By defining a positive outcome as employment in the first, second, and third quarters after the quarter of exit, the measure approximates retention for at least six months following participation in the program. However, a positive outcome on the retention measure does not necessarily indicate continuous employment with the same employer.

Six Months Earnings Increase

Methodology:
Of those who are employed in the first quarter after the exit quarter:
[Total earnings in the second quarter plus total earnings in the third quarter after the exit quarter] **minus** [total earnings in the second quarter plus total earnings in the third quarter prior to the participation quarter] divided by the number of 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. Individuals whose employment in either the first or third quarter after the exit quarter was determined from supplementary sources and not from wage records are excluded from the measure.
- Grantees must initiate processes to obtain the second and third quarter pre-program earnings for the individual at the time of participation in the program.
- Earnings may be excluded from each of the total quarterly amounts only where the grantee has determined that false or erroneous wage record data has been reported to the grantee, or the individual has received distributions related to severance pay or other earnings attributable to termination from an employment situation. Such a determination by the grantee must be based on documented procedures and processes for editing and cleaning wage record data and is subject to audit.

SPECIAL NOTE: Currently, mechanisms are not in place to provide access to wage records for all grantees operating ETA national or discretionary grant programs, including programs such as the H-1B Technical Skills Training, Migrant and Seasonal Farm Workers, Native American Employment and Training, and Senior Community Service Employment programs. For these grantees, supplemental sources of data will be permitted as an interim means of reporting on the earnings increase measure until all grantees in a program have access to wage records. Any adjustments necessary for the implementation of this measure using supplemental information as the data source will be addressed in separate program guidance.

Discussion:
This measure is designed as a pre- and post-program look at earnings change. The second and third quarters prior to participation were selected as the pre-program reference period because trends have shown that many program participants experience intermittent or stop-gap employment immediately prior to participating in employment and training programs. For purposes of the common measures, the pre-program earnings of dislocated workers will be determined as described above – second and third quarters prior to the quarter of participation – regardless of the date of dislocation. The collection of earnings in the second and third quarters after the exit quarter effectively captures an individual's earnings six months after entry into employment.

C. Youth Measures

Placement in Employment or Education

Methodology:
Of those who are not in post-secondary education, employment, or the military at the date of participation:

The number of participants who are in employment or 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 participants who exit during the quarter.

Operational Parameters:

- Individuals who are in post-secondary education, employment, or the military 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, military, 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.

Discussion:
Participants who enter ETA-funded youth programs while already in post-secondary education, employment, or the military have achieved the desired outcome under this measure. Thus, these individuals are excluded from this measure. Successfully returning young people to school or alternative education is desirable, but secondary school enrollment does not qualify as a placement under this measure. Individuals in secondary school at exit are included in this measure, which is a change from previous policy guidance (TEGL 15-03). This revised policy is consistent with ETA's vision to ensure youth successfully complete their secondary education, which will ultimately lead to better long-term success in the workforce.

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 participants who attain a diploma, GED, or certificate by the end of the third quarter after the exit quarter divided by the number of 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.
- 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.
- 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.

Discussion:
Individuals in secondary school at exit are included in this measure, which is a change from previous policy guidance (TEGL 15-03). This revised policy is consistent with ETA's vision to ensure youth successfully complete their secondary education, which will ultimately lead to better long-term success in the workforce.

Literacy and Numeracy Gains

Methodology:

Of those out-of-school youth who are basic skills deficient:

The number of participants who increase one or more educational functioning levels divided by the number of participants who have completed a year in the program (i.e., one year from the date of program participation) **plus** the number of participants who exit before completing a year in the program.

Operational Parameters:

- Pre-test must occur within 60 days following the date of participation.
- Individuals who are determined not to be basic skills deficient at pre-test are excluded from this measure (i.e., programs will not be held accountable for these individuals under this measure).
- When administering assessment tools, individuals with disabilities (as defined in 29 CFR 37.4) should be accommodated according to: (1) section 188 of WIA, (2) guidelines associated with the assessment tool used to determine functioning levels, and (3) state law or policies. Further guidance can be found in this Section under *Testing Youth with Disabilities*.
- The measure includes individuals who are given an initial assessment but either: (1) do not post-test before exiting the program, or (2) exit before completing a year in the program (i.e., one year from the date of program participation).
- To be included in the numerator, a participant must demonstrate through post-test that he/she has advanced one or more educational functioning levels beyond the level in which he/she was initially placed at pre-test within one year from the date of participation. (Note: the one-year time period is from date of participation, not date of pre-test).
- In-school youth are excluded from this measure.

Discussion:

The literacy and numeracy gains indicator measures the increase in the skills of participants through a common assessment tool administered at program entry and regular intervals thereafter. Youth participants for whom the goal of literacy and/or numeracy gains is most appropriate are those with basic skills deficiencies. Participants who are not basic skills deficient cannot achieve a positive outcome because they have attained basic literacy and numeracy. Exclusion of individuals who are not basic skills deficient focuses the measure on the participants with the greatest need for remediation, and minimizes the burden of testing individuals who, by virtue of their existing skill level, will not achieve a positive outcome under this measure.

In-school youth already undergo a number of assessments within the school system in order to comply with state standards of learning and, in many states, graduation exams. Requiring in-school youth to receive further academic assessments, outside of the school system is redundant since it is the responsibility of local school districts to ensure proper academic assessment of in-school youth. In addition, the assessments benchmarked to the National Reporting System (NRS) are not normalized for in-school youth. Therefore, in-school youth are excluded from this measure.

Under a normal distribution of pre-test scores, most participants' scores will place the individuals in a range where they have completed some of the skills in that particular educational functioning level. Therefore, for a majority of participants, a positive outcome for this measure (i.e., completion of one educational functioning level and an increase to the next level) is not likely to require the equivalent of completing two grade levels, but will average to the equivalent of one grade level.

National Reporting System:

- To maintain consistency with the implementation of the common measures by the Department of Education (ED), ETA is adopting policies for the ED outcome measure of educational gain, as outlined in the NRS. The NRS was developed by ED's Division of Adult Education and Literacy for implementation of an accountability system for federally funded adult education programs under WIA Title II.

Educational Functioning Levels:

- Programs assess participants at intake or within 60 days following the date of participation to determine their initial educational functioning level. As outlined in the NRS, there are two sets of educational functioning levels – six levels for Adult Basic Education (ABE) and six levels for English-as-a-Second language (ESL) students. The ABE levels roughly equate to two grade levels. Further guidance on the educational functioning level descriptors can be found in Attachment D.
- Each ABE and ESL level describes a set of skills and competencies that students entering at that level demonstrate in the areas of reading, writing, numeracy, speaking, listening, functional, and workplace skills. These descriptors provide guidelines for placing participants in educational functioning levels, based on performance on standardized tests. After a participant has completed a uniform, standardized assessment procedure, programs use these descriptors to determine the appropriate initial ABE or ESL level in which to place students.
- If a participant is functioning at different levels in reading, writing, numeracy, speaking, listening, functional, and workplace areas, the individual is placed in different ABE and ESL levels across the functioning areas. In the post-test assessment, if the participant demonstrates an increase to the next functioning level in any of the areas – reading, writing, numeracy, speaking, listening, functional, and workplace areas – he/she has made an educational gain and should be included in the numerator. For example, an individual is placed in the Beginning Basic Education level (the second ABE level) in math and the Low Intermediate Basic Education level (the third ABE level) in reading at pre-testing. The individual achieves an educational gain if he/she places in either the third ABE level in math or the fourth ABE level in reading at post-testing.

Assessment Tool:

- To measure the increase in skills of individuals, programs must use an assessment procedure comprised of a standardized test or a performance assessment with standardized scoring protocols.
- States, grantees, or contractors are not required to use the same assessment tool throughout their jurisdictions. However, programs must adhere to the following in choosing an assessment tool: (1) The same assessment tool is administered to the participant for pre-testing and post-testing;

(2) The assessment tool and its scores must crosswalk directly to the educational functioning levels so that educational gains can be reported in terms of increase in one or more ABE or ESL levels; and (3) Tests must be administered in a standardized manner throughout the jurisdiction (i.e., used consistently and reliably across programs and produces observable results).

- Tests must be administered to individuals with disabilities (as defined in 29 CFR 37.4) with reasonable accommodations, as appropriate (see additional guidance under *Testing Youth with Disabilities*).
- The NRS provides test benchmarks for educational functioning levels (see Attachment D). The benchmarks are provided as examples of how students functioning at each level would perform on the tests. Inclusion of these tests in this guidance in no way implies that they are equivalent or that they should be used as the basis for assessment. In addition, these tests do not necessarily measure the same skills.

Testing Interval:

- Participants identified as basic skills deficient should be post-tested at least once by the end of one year following the individual's participation date.
- For participants who have completed one year following the participation date, if more than one assessment is administered after the initial test, the latest assessment within one year of participation should be used to determine if the participant has demonstrated an increase in at least one educational functioning level.
- Individuals who remain basic skills deficient and continue to participate after completing a full year in the program, including pre-test and post-test, should continue to receive basic skills remediation services. These participants should be included in the measure for the first year of participation. They are not included again in the measure until they have completed a second full year in the program. At the completion of the second year, these participants should be post-tested and included in the measure. To determine an increase of one or more levels, the participant's post-test scores from the second year in the program should be compared to the scores from the test that was administered at the latest point during the first year.

Testing Youth with Disabilities:
When administering assessment tools, individuals with disabilities are to be provided with reasonable accommodations, as appropriate, according to:

1) Section 188 of the WIA;
2) Guidelines associated with the assessment test; or
3) State laws or policy.

The Department's regulations implementing WIA section 188, found at 29 CFR part 37, provide a general definition of "reasonable accommodation" for individuals with disabilities. In essence, such accommodations are "[m]odifications or adjustments," made on a case-by-case basis, "that enable a qualified individual with a disability . . . to receive aid, benefits, services, or training equal to that provided to qualified individuals without disabilities." See 29 CFR 37.4, definition of "reasonable accommodation." In the assessment context, therefore, accommodations are changes that are made to the materials or procedures used for the assessment in order to "level the playing field" -- to ensure that the assessment tool measures the individual's skills and abilities, and not his or her disabilities. Because youth with disabilities are expected to achieve the same gains as other youth, it is critically important that appropriate accommodations be provided for the assessment process, to ensure that the gains achieved by these youth can be determined accurately.

Accommodations for the assessment process generally fall into the following categories:

1. Changes to the methods of **Presentation** of the test used as an assessment tool: e.g., providing Braille versions of the test, or orally reading the directions or test questions to test-takers;
2. Changes to the methods of **Response** to the test questions: e.g., having the test-taker point to a response or use a computer for responding;
3. Changes to the **Setting** in which the test is provided: e.g., permitting the test to be taken at home, or in small groups, rather than in a large-group or institutional setting; and
4. Changes to the **Timing/Scheduling** of the test: e.g., extending the amount of time generally provided for completion of the test, permitting frequent breaks, etc.

Thurlow, M., House, A., Boys, C., Scott, D., & Ysseldyke, J. (2000). *State participation and accommodation policies for students with disabilities: 1999 update* (Synthesis Report No. 33). Minneapolis, MN: University of Minnesota, National Center on Educational Outcomes. Retrieved on 04/01/2005 at the following website: http://education.umn.edu/NCEO/OnlinePubs/Synthesis33.html

The Department fully expects that most youth with disabilities can and should be assessed using tests that specifically crosswalk to the educational functioning levels, with the use of accommodations where needed. We also recognize, that in very limited instances, use of these testing instruments, even with appropriate accommodations, may not provide a valid or reliable evaluation of the literacy and

numeracy skills of a youth with one or more disabilities. These instances may arise because of the nature or extent of a particular individual's disability, and/or because of limitations in the testing instruments themselves. In those rare instances, service providers and grant recipients may use alternate assessment tools to measure gains in numeracy and literacy for youth with disabilities, if those alternate tools have been deemed by the individual state to provide valid and reliable indicators of information that are comparable to the information provided through the educational functioning levels. Such alternate tools may include, but are not limited to, (1) portfolio assessments; (2) one-on-one performance assessments; and (3) alternative standardized tests. If such alternative assessment tools are used, the state and/or local level should determine, based on the type of assessment, what constitutes a successful gain for the literacy/numeracy measure.

It is advisable that youth professionals receive specific guidance and training in the administration of alternate assessments to youth with disabilities to ensure they have the necessary skills and knowledge to appropriately administer the tests and accurately interpret results.

6. Data Sources. This Section describes data sources and methods to collect data for the common measures. The data source(s) applicable to each measure are as follows:

PERFORMANCE MEASURE	DATA SOURCE
Adult Measures	
Entered Employment	Wage records and supplemental data sources
Retention	Wage records and supplemental data sources
Earnings Increase	Wage records Supplemental data sources (only for grantees that do not have access to wage records)
Youth Measures	
Placement in Employment or Education	Wage records and supplemental data sources for placement in employment and military Administrative records for placement in education or training
Attainment of a Degree or Certificate	Administrative records
Literacy and Numeracy Gains	Assessment instrument

A. Wage Records

To ensure comparability of the common measures on a national level, wage records are the primary data source for the employment-related measures (except as noted in this Section).

Unemployment Insurance Wage Records

To the extent it is consistent with state law, Unemployment Insurance (UI) wage records will be the primary data source for tracking the adult entered employment, retention, and earnings increase measures and the employment portion of the youth placement in employment or education measure.

Additional Wage Records

While most forms of employment in a state's workforce are "covered" and will be in the UI wage records, certain types of employers and employees are excluded by Federal UI law or are not covered under states' UI laws. States may use record sharing and/or automated record matching with other employment and administrative data sources to determine and document employment and earnings for "uncovered" workers.

Additional wage record data sources include the following:

- Wage Record Interchange System (WRIS)
- U.S. Office of Personnel Management (OPM)
- U.S. Postal Service
- U.S. Department of Defense
- Railroad Retirement System
- State government employment records
- Local government employment records
- Judicial employment records
- Public school employment records
- State New Hires Registry
- State Department of Revenue or Tax (for individuals who are self-employed, information must be obtained through record-sharing or automated matching of state tax records)

ETA, in collaboration with the OPM, U.S. Postal Service, and the Department of Defense, has created a pilot data exchange system to provide access for all states to wage record information on Federal and military employment. Updates are available at http://www.doleta.gov/performance.

B. Supplemental Sources of Data

Supplemental data will be used for program management purposes and to gain a full understanding of program performance and activities. Although a majority of employment situations will be covered by wage records, certain other types of employment, particularly self-employment, are either excluded from the sources of data identified under Subsection A above or very difficult for grantees to access due to data confidentiality issues (e.g., access to State Department of Revenue or Tax records). Grantees should not be discouraged from providing entrepreneurial training or assisting the hard-to-serve simply because the subsequent employment is not covered by wage records. Therefore, in order to convey full and accurate information on the employment impact of ETA programs, grantees may use supplemental sources of data to document a participant's entry and retention in employment. For grantees that do not have access to wage records, supplemental sources of data will be permitted as an interim means of reporting on the earnings increase measure until all grantees in a program have access to wage records.

Allowable sources of supplemental information for tracking employment-related outcomes in the performance measurement periods include case management notes, automated labor exchange system administrative records, surveys of participants, and contacts with employers. All supplemental data and methods must be documented and are subject to audit.

C. Administrative Records

Administrative records will be the data source for the education and training portion of the placement in employment or education measure and the attainment of a degree or certificate measure. All data and methods used to determine placement in education and training or achievement of a degree or certificate must be documented and are subject to audit.

Placement in Post-Secondary Education or Advanced Training/Occupational Skills Training

The following data sources can be used to determine whether participants in youth programs are placed in post-secondary education and/or advanced training/occupational skills training:

1. Case management notes and surveys of participants to determine if the individual has been placed in post-secondary education and/or advanced training/occupational skills training; or

2. Record-sharing agreements and/or automated record matching with administrative/other data sources to determine and document that the participant has been placed in post-secondary education and/or advanced training/occupational skills training. These data sources may include:
   - State board governing community colleges
   - State board governing universities
   - State education associations
   - Integrated post-secondary or higher education reporting unit
   - Training institutions/providers

Degree or Certificate
The following data sources can be used to determine whether participants in youth programs attain degrees or certificates:

1. Case management notes and surveys of participants to determine that the individual has received a degree or certificate; or

2. Record sharing agreements and/or automated record matching with administrative/other data sources to determine and document that the participant has received a degree or certificate. These data sources may include:
   - State board of Education
   - State board governing community colleges
   - State board governing universities
   - State licensing boards for private schools
   - State education associations
   - Integrated post-secondary or higher education reporting unit
   - State Department of Professional or Occupational Regulation (possibly other units such as health care administration or specific boards like the "Board of Nursing")
   - Professional, industry, or employer organization or a product manufacturer or developer
   - Training institutions/providers
   - Adult Basic Education providers (GED/equivalent testing agencies)

7. Action Required. Please make this information available to appropriate program staff.

8. Attachments.

Attachment A: Federal Job Training and Employment Programs Impacted by Common Measures
Attachment B: Common Measures At-A-Glance
Attachment C: Definitions of Key Terms
Attachment D: Educational Functioning Level Descriptors