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September 23, 2015

The Honorable Lamar Alexander
Chairman
The Honorable Patty Murray
Ranking Member
Committee on Health, Education, Labor, and Pensions
United States Senate

The Honorable John P. Kline
Chairman
The Honorable Robert C. "Bobby" Scott
Ranking Member
Committee on Education and the Workforce
United States House of Representatives

Workforce Innovation and Opportunity Act: Performance Reporting and Related Challenges

In July 2014, the Workforce Innovation and Opportunity Act (WIOA), Pub. L. No. 113-128, brought changes to the programs that create a foundation for the nation's employment and job training system. WIOA requires that the Department of Labor (DOL) and the Department of Education (Education) collaborate to implement a common performance accountability system for six core programs, which the agencies note is an historic opportunity to align definitions, streamline performance indicators, and integrate reporting across programs. These core programs, which DOL and Education administer through grants to state agencies, are: Title I Adult, Title I Dislocated Worker, Title I Youth, Wagner-Peyser Employment Services, Adult Education and Family Literacy Act, and State Vocational Rehabilitation Services (VR) programs.¹ WIOA establishes six performance indicators on which states must report for the core programs, such as those related to employment status, earnings, and skills gains in education or training programs, starting in July 2016.² This represents a noticeable change from the prior law, the Workforce Investment Act of 1998 (WIA), under which performance indicators

¹ DOL's Employment and Training Administration administers the Title I programs and Wagner-Peyser Employment Services and oversees their implementation, which is carried out by state workforce agencies and local workforce development boards or state grantees in the case of Wagner-Peyser. Education's Office of Career, Technical and Adult Education provides grants to states for the Adult Education and Family Literacy Act program, which in turn are mostly distributed to local adult education providers such as community colleges, community-based organizations, and volunteer literacy organizations. Education's Rehabilitation Services Administration provides grants to states to administer the VR program. Many states have separate agencies serving blind or visually impaired individuals in addition to agencies that serve all other individuals with disabilities. In addition, states vary in terms of the organizational positioning of the program, with the program being housed in education, workforce, social service, disability program agencies, or elsewhere.

² Pub. L. No. 113-128, §§ 116(b), 506(b), 128 Stat. 1425, 1471, 1703 (2014). For descriptions of each performance indicator and related exceptions, see Enclosure I.

varied considerably across several of the core programs.³ However, under WIA, all of the six programs have already been reporting on performance related to employment and most have been reporting on performance related to earnings.

Section 505 of WIOA includes a provision for GAO to issue an interim and final report on federal and state databases and data exchange agreements containing job training information relevant to WIOA.⁴ The law also specifies that GAO explore opportunities to enhance the quality of these data. This interim report focuses on the current state of performance reporting for the core programs and the data systems and exchange agreements in place at the federal level.

Specifically, we address the following issues in this report:

1. How federal and state agencies currently report on WIA performance measures for core job training programs; and
2. challenges to performance reporting previously identified by federal auditors and anticipated challenges.

On July 22, 2015 we briefed your office on our preliminary findings. This letter formally transmits the final updated slides. In a subsequent review, we will examine databases and exchanges in selected states, any opportunities to enhance the quality of data in federal and state databases, and protection of personal data shared across agencies. We expect to issue the final report for our subsequent review in 2016.

To address our objectives, we reviewed DOL and Education documentation regarding performance indicators, relevant data systems and data exchange agreements and interviewed officials from these agencies who oversee performance reporting for the core programs. Our focus was on current performance indicators related to employment and earnings as they will be especially relevant under WIOA performance reporting requirements. We reviewed past GAO and federal inspector general (IG) reports and interviewed IG officials about challenges with performance reporting and data systems. We also interviewed officials from five national associations representing state agencies to obtain information on states' experiences with performance reporting, including current and anticipated challenges. We purposefully selected these national associations to gain perspectives on each of the employment and training programs WIOA designated as core. In addition, we interviewed officials from two organizations that are contracted to manage federally-funded data exchange systems, as well as those from one organization with expertise in workforce data quality issues (see enclosure for a list of organizations we interviewed). Finally, we reviewed relevant federal laws and regulations.

We conducted this performance audit from February 2015 to September 2015 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for

³ Throughout the report, we refer to WIA performance indicators as those that the core programs use until WIOA performance reporting requirements take effect, regardless of the source of the indicator.

⁴ For the purposes of this report, we generally use the term data systems instead of databases, as it more broadly captures the tools federal agencies use to collect, verify, aggregate, and store data. Data exchange agreements, which allow the comparison and/or sharing of data maintained by different organizations, may be documented through Memoranda of Agreement or Understanding or other types of agreements. In this report, we will use the term data exchange agreement when referring specifically to such a memorandum, or we will use the term data exchange system when referring to a system that implements this type of agreement.

our findings and conclusions based on our audit objectives. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

The following summarizes our findings (see enclosure I for details):

Federal agencies rely on state data sources for performance reporting, and generally do not obtain personally identifiable information (PII) in the process.⁵ Specifically, state agencies provide data to federal agencies for performance reporting. To do so, state agencies collect the necessary data from local agencies and other sources, including state Unemployment Insurance (UI) agencies that hold wage records.⁶ Many states access these wage records through federally-funded data exchange systems using PII to match records. For example, all states participate in the data exchange system used for the core programs administered by DOL (the Wage Record Interchange System—WRIS) and 36 states participate in the one used for the core programs administered by Education (the Wage Record Interchange System – 2—WRIS2). States then submit outcome data to federal data systems for performance reporting. Four of the five federal systems used for performance reporting on core programs do not contain PII and therefore have been designated by DOL and Education as low risk in terms of the potential harm that could result from improper PII disclosure, based on federal standards, whereas the system used for the VR program does contain PII and has therefore been designated as moderate risk.

Federal auditors have previously identified various challenges with performance reporting for employment and training programs, such as those related to data consistency and validation, and IG officials and representatives of state agencies said these issues could continue under WIOA. For example, along with the DOL IG, we reported in December 2013 that flexibility in DOL's guidance for defining program participants and key dates, such as program exit, had led to inconsistent and incomplete data reporting by states.⁷ Moreover, federal officials and representatives of state agencies we spoke with anticipate additional changes and challenges to performance reporting for states. For example, some states currently collect wage and employment data for Education programs in various ways, including follow-up surveys of participants, but WIOA will require all core programs to use quarterly wage record data for reporting, in a manner consistent with state law.⁸ This change presents a challenge for education programs not party to a data sharing agreement. Several federal officials and representatives of state agencies we interviewed noted that sharing data may be difficult because of (1) lack of working relationships with other agencies, such as in cases where education programs have used methods other than data matching to obtain information on outcomes, (2) limited resources, such as in the case of state UI agencies needing to respond to

⁵ PII may include information such as names or Social Security numbers (SSNs).

⁶ Wage records may include an individual's wage amount, an employee identifier (name or SSN), and an employer identifier (name or account number).

⁷ We recommended that DOL provide additional guidance to improve the consistency of the data reported by states and DOL indicated it planned to work on clarifying guidance. See GAO, *Workforce Investment Act: DOL Should Do More to Improve the Quality of Participant Data*, GAO-14-4 (Washington, D.C.: Dec. 2, 2013).

⁸ Pub. L. No. 113-128, § 116(i)(2), 128 Stat. 1425, 1481 (2014).

data requests from a larger group,⁹ and (3) privacy laws in some states that may restrict sharing confidential data. Meanwhile, federal agencies are developing guidance to help state and local agencies implement WIOA performance reporting.¹⁰ Education and DOL jointly issued proposed regulations in April 2015 that are intended in part to address some of the challenges with performance reporting, although final rules may differ as they incorporate changes based on input from the public comment process.¹¹

We provided a draft of this product to the Secretary of Education and the Secretary of Labor for comment. The agencies provided technical comments, which we incorporated as appropriate. We are sending copies of this report to the appropriate congressional committees, the Secretary of the Department of Education, and the Secretary of the Department of Labor. In addition, the report is available at no charge on the GAO website at <http://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (202) 512-7215 or sherrilla@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. In addition to the contact named above, Bill MacBlane (Assistant Director), James Bennett, Kurt Burgeson, Marisol Cruz, John de Ferrari, Alexander Galuten, Danielle Giese, Farrah Graham, Laura Heald, Michael Kniss, Kelsey Kreider, Amy Moran Lowe, Sheila McCoy, Ada Nwadugbo, Walter Vance, and Charles Willson made key contributions to this report.



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Enclosure(s) – 2

⁹ For example, according to DOL officials, the state agency holding wage data is not permitted to use the state's unemployment compensation grant toward the costs of disclosing wage data for purposes that do not benefit the unemployment compensation program, such as workforce program performance reporting.

¹⁰ For example, see U.S. Department of Labor, Training and Employment Notice No. 31-14, *Early Operating Guidance for Implementation of the Workforce Innovation and Opportunity Act* (Washington, D.C.: April 30, 2015) and U.S. Department of Labor, Training and Employment Guidance Letter WIOA No. 01-15, *Operations Guidance Regarding the Impact of Workforce Innovation and Opportunity Act Implementation on Waivers Approved Under the Workforce Investment Act* (Washington, D.C.: July 1, 2015).

¹¹ See 80 Fed. Reg. 20,574 (Apr. 16, 2015).



Workforce Innovation and Opportunity Act

Performance Reporting and Related Challenges

**Briefing to the U.S. Senate Health, Education, Labor and Pensions Committee and
U.S. House Education and the Workforce Committee**

Introduction

- In July 2014, the Workforce Innovation and Opportunity Act (WIOA), Pub. L. No. 113-128, brought changes to the programs that create a foundation for the nation's employment and job training system.¹
- The law designated six of these as core programs.² The Departments of Labor and Education administer these programs primarily through grants to state agencies. Specifically:
 - Department of Labor (DOL) Programs :³
 - **Title I Adult:** provides training and services, such as occupational skills training, career counseling and job searches, to adults ages 18 years or older.
 - **Title I Dislocated Worker:** provides the same services as the Title I Adult program for those who, generally, among other criteria, anticipate or have been terminated or laid-off or who were self-employed.

¹ Provisions of the law take effect at different times. For example, Title IV provisions, affecting the State Vocational Rehabilitative Services program, generally took effect upon enactment. However, most provisions for Titles I-III, which affect the core Department of Labor and the Adult Education and Family Literacy Act programs, took effect on July 1, 2015. Some provisions related to the performance accountability system do not take effect until July 2016.

² When we use the term "core program," we are referring to the programs that were eventually labeled as core programs under WIOA.

³ DOL's Employment and Training Administration administers these programs and oversees their implementation, which is carried out by state workforce agencies and local workforce development boards. The local workforce development board selects the entities that will operate American Job Centers (formerly called one-stop centers) to provide services.

Introduction (cont.)

- DOL Programs (cont.)
 - **Title I Youth:** provides various services, including educational supports, occupational skill training, counseling, and paid and unpaid work experiences, generally to low-income youths who are facing one or more barriers to employment.
 - **Wagner-Peyser Employment Services:** provides employment services, including job searches and placement assistance and referrals to employers.
- Department of Education (Education) Programs:
 - **Adult Education and Family Literacy Act:** generally assists adults in becoming literate or achieving proficiency in English, obtaining the knowledge and skills necessary for employment and self-sufficiency and to assist in their children's educational development, and completing a secondary school education.⁴
 - **State Vocational Rehabilitation Services (VR Program):** provides services such as counseling, job training and job search assistance, related to the employment of people with disabilities.⁵

⁴ Education's Office of Career, Technical and Adult Education provides grants to states, which in turn distribute most of the federal funds to local adult education providers. The local provider network includes local educational agencies, community colleges, community-based organizations, and volunteer literacy organizations.

⁵ Education's Rehabilitation Services Administration (RSA) provides grants to states to administer the VR program. Many states have separate agencies serving blind or visually impaired individuals in addition to agencies that serve all other individuals with disabilities. In addition, states vary in terms of the organizational positioning of the program, with the program being housed in education, workforce, social service, disability program agencies, or elsewhere.



Background: Performance Indicators for the Core Programs

- For the six core programs, WIOA establishes six performance indicators on which states must report, with some exceptions, starting in July 2016.⁶ These measures are:
 - **Employment in Second Quarter After Exit** – Percentage of program participants who are in unsubsidized employment during the second quarter after exit from the program.
 - **Employment in Fourth Quarter After Exit** – Percentage of program participants in unsubsidized employment during the fourth quarter after exit from the program.
 - **Earnings** – Median earnings of program participants in unsubsidized employment during the second quarter after exit from the program.
 - **Skill Gains in Education or Training Programs** – Percentage of program participants who, during a program year, are in an education or training program leading to a recognized postsecondary credential or employment and who are achieving measurable skill gains toward such a credential or employment.

⁶ Pub. L. No. 113-128, §§ 116(b), 506(b), 128 Stat. 1425, 1471, 1703 (2014). For the Title I Youth program, the two employment measures include participants who are in education or training in addition to those in unsubsidized employment. Additionally, Title III programs, including Wagner-Peyser Employment Services, are not required to report on credential attainment or measurable skill gains.

Background (cont.): Performance Indicators for the Core Programs

- **Attainment of a Credential or Diploma** – Percentage of program participants obtaining a recognized postsecondary credential, or a secondary school diploma or its recognized equivalent, during participation in or within 1 year of exit from the program.
- **Effectiveness in Serving Employers** – Indicators of effectiveness in serving employers to be developed by Secretaries of Education and DOL.

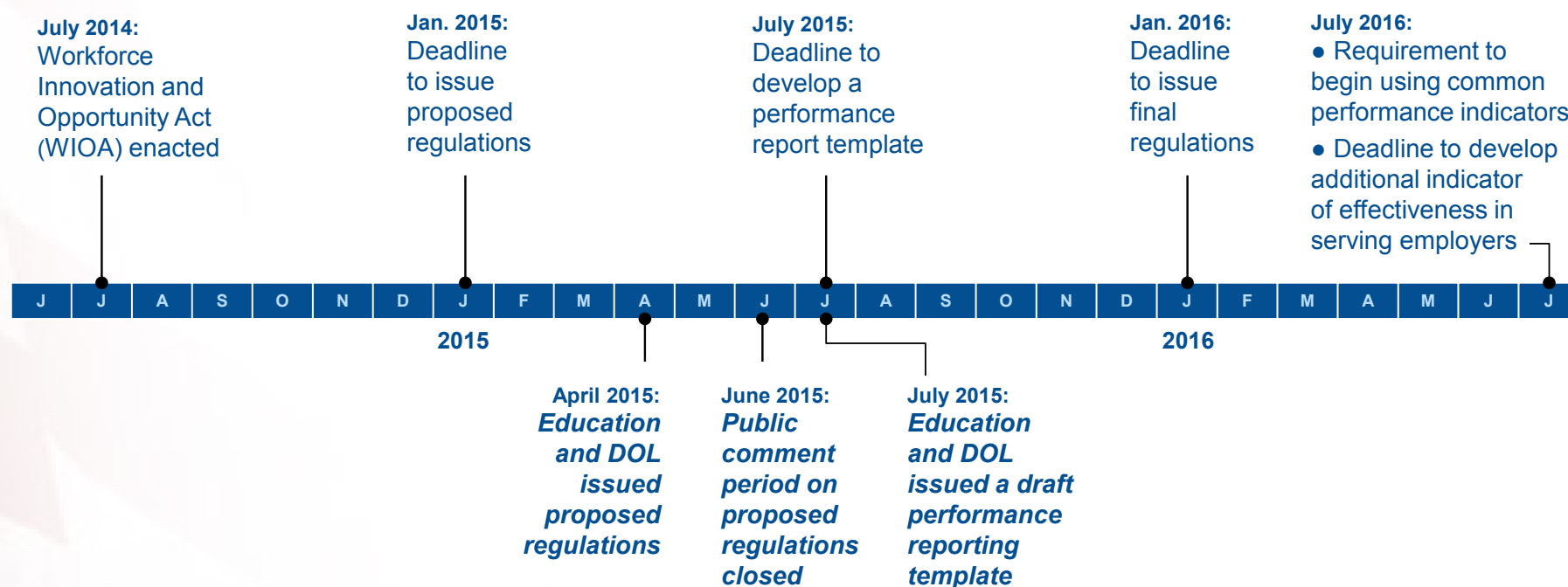
Background (cont.): WIOA Modified Performance Measure Reporting from the Prior Law

- As shown in appendix I, under the prior law, the Workforce Investment Act of 1998 (WIA), and related guidelines, performance reporting varied considerably for several of the core programs.⁷ As a result, having shared performance indicators under WIOA will be a noticeable change for the six programs, given that WIA did not require programs to use and report on the same performance indicators to be reported under WIOA.
- However under WIA, all of the six programs have already been reporting on performance related to employment, and most (4 of 6 programs) have been reporting on performance related to earnings.

⁷ States will be reporting under WIA-related guidelines until 2016. Throughout the report, we refer to WIA performance measures as those measures that the core programs use until WIOA performance reporting requirements take effect, regardless of the source of the indicator. For Title I and Wagner-Peyser Employment Services programs, by program year 2013, almost all states were reporting on a set of common performance measures. Using waivers, DOL provided states with the option of reporting on these common measures instead of a list set forth in law in an effort to help minimize reporting differences and performance requirements across workforce programs.

Background (cont.): Federal Agency Requirements for Common Performance Accountability System and Related Time Frames

- WIOA requires that DOL and Education collaborate to implement a common performance accountability system, including developing common definitions and reporting methodologies. Key dates for developing this system include:



Source: GAO analysis of relevant federal law and Federal Register notices.

Interim Report Objectives

- Section 505 of WIOA includes a provision for GAO to issue an interim and final report on federal and state databases and data exchange agreements containing job training information relevant to WIOA. Among other provisions, the law specifies that GAO provide information on existing federal and state databases and data exchange agreements (including their purpose, their data elements – e.g., those containing personally identifiable information, such as names or Social Security numbers (SSNs) – and federal and state agencies with access to them) and explore opportunities to enhance the quality of these data.
- This interim report focuses on the current state of performance reporting for the core programs and the databases and exchange agreements in place at the federal level.⁸

⁸ For the purposes of this report, we generally use the term data systems instead of databases, as it more broadly captures the tools federal agencies use to collect, verify, aggregate, and store data. Data exchange agreements, which allow the comparison and/or sharing of data maintained by different organizations, may be documented through Memoranda of Agreement or Understanding or other types of agreements. In this report, we will use the term data exchange agreement when referring specifically to such a memorandum, or we will use the term data exchange system when referring to a system that implements this type of agreement.

Interim Report Objectives (cont.)

- This briefing addresses:
 - How federal and state agencies currently report on WIA performance measures for core job training programs; and
 - Challenges to performance reporting previously identified by federal auditors and anticipated challenges.
- In a subsequent review, we will examine databases and exchanges in selected states, any opportunities to enhance the quality of data in federal and state databases, and protection of personal data shared across agencies. The final report for our subsequent review is expected to be issued in 2016.

Scope and Methodology

- To address our objectives, we:
 - Reviewed prior GAO and IG work, and relevant federal laws and regulations.
 - Interviewed federal officials, including DOL and Education program officials and Inspector General (IG) officials, and reviewed related documentation, such as performance reporting guidance and data sharing agreements. Our focus was on current performance indicators related to employment and earnings as they will be especially relevant under WIOA performance reporting requirements.
 - Interviewed officials from national associations representing state agencies about states' experiences with performance reporting, including current and anticipated challenges.
- Draft briefing slides were provided to DOL and Education officials in advance of the briefing to help ensure the accuracy of the information provided. Technical comments were incorporated as appropriate.

Summary of Findings

- Federal Agencies Rely on State Data Sources for Performance Reporting and Generally Do Not Obtain Personally Identifiable Information (PII) in the Process
- Various Challenges, Including Those Related to Data Quality and Sharing, Have Been Identified



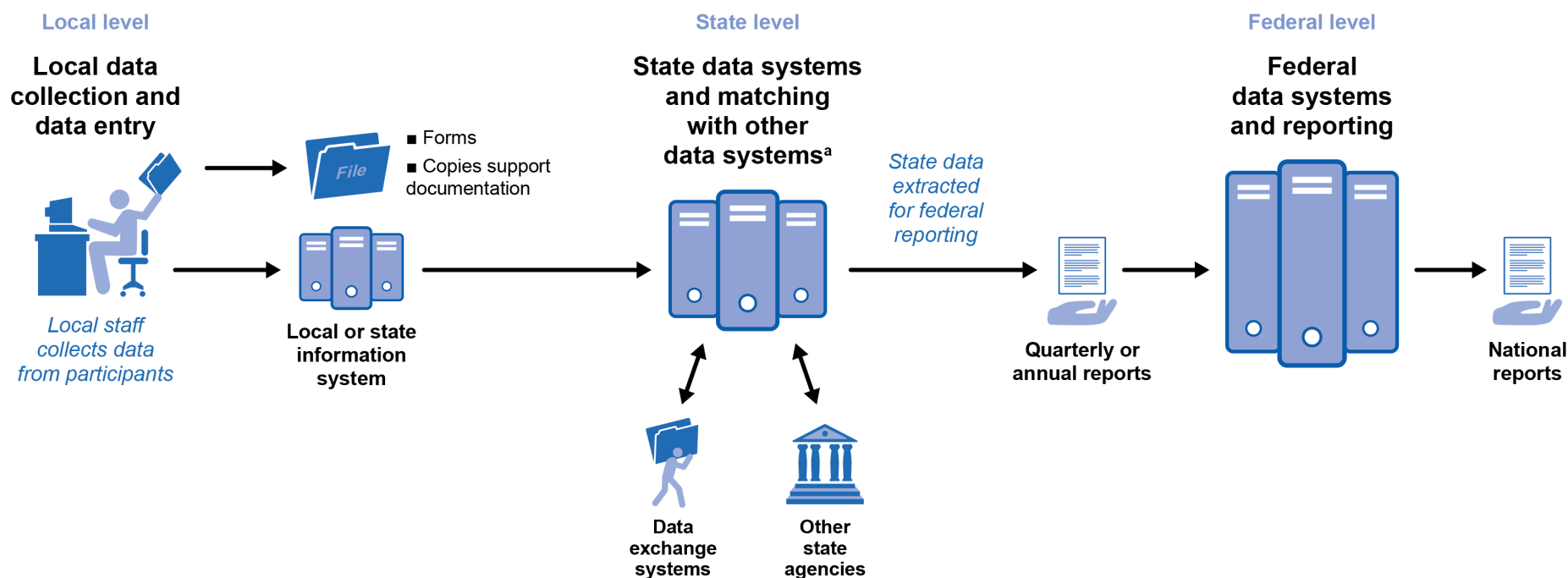
Objective 1: Currently, how do agencies report on WIA performance measures for core job training programs?

- Federal Agencies Rely on State Data Sources for Performance Reporting and Generally Do Not Obtain Personally Identifiable Information (PII) in the Process
 - State Agencies Provide Performance Data to Federal Agencies for WIA Reporting
 - DOL Funds the Sharing of Federal and State Wage and Employment Records to Assist States in Performance Reporting
 - Federal Data Systems Used for Performance Reporting Primarily Have Data on Program Outcomes, with Limited or No Personally Identifiable Information

State Agencies Provide Performance Data to Federal Agencies for WIA Reporting

- State agencies reporting on WIA program performance collect the necessary data from local agencies and other sources, including state Unemployment Insurance (UI) agencies that hold wage records. The state UI agencies use these records—which include an individual’s wage amount—to administer the joint federal and state UI program.
- States then enter performance data into federal data systems, as shown in figure 2.
 - States submit these data to federal systems in either aggregate or individual form, depending on the program.
 - After the data are received, the federal systems run automatic edit checks designed to ensure data quality.
- The federal agencies use these state data to produce their performance reports for Congress.

Figure 2: General Flow of Performance Outcome Data to Federal Agencies



Source: GAO analysis of DOL and Education documentation.

^a There may be some differences in the information flow for the State Vocational Rehabilitation Services program, according to Department of Education officials.



DOL Funds the Sharing of Federal and State Wage and Employment Records to Assist States in Performance Reporting

- In order to help states obtain the data needed for performance reporting, particularly when participants secure employment in another state or with the federal government, DOL currently funds three data systems that allow state agencies reporting on performance to access other states' UI wage records or federal employment data.
 - DOL does not have access to the data that are shared because the agency's role, as indicated in the data-sharing agreements, is to administer the data exchanges, which includes overseeing grant-making and contracting activities.⁹
- As shown in table 1, there are different data exchange systems for states to access wage record data for: participants in workforce programs, participants in the VR and Adult Education and Family Literacy Act programs, and federal employees (mainly accessible to workforce programs).

⁹ According to the Fair Information Practice principles, a widely accepted set of principles for protecting Personally Identifiable Information (PII), the collection of personal information should be limited and this information should not be disclosed or otherwise used for other than a specified purpose without the consent of the individual or legal authority. Therefore, consistent with the Fair Information Practice principles, DOL does not have access to the data that are shared via the federal data exchange systems.



Table 1: Federal Data Exchange Systems States Currently Use to Obtain Data for Performance Reporting on Core Programs

Name	Core Programs	Purpose/Use	Examples of Data Elements	Parties to the Agreement
Wage Record Interchange System (WRIS)	Title I Adult, Dislocated Worker, and Youth; Wagner-Peyser Employment Services	WRIS facilitates interstate exchange of UI wage data between participating states for the primary purpose of assessing and reporting on state and local performance for WIA programs.	Wage data, employee names, and SSNs	State agency holding wage data, state Performance Accountability and Customer Information Agency (PACIA), ^a and DOL's Employment and Training Administration (ETA). ^b Participating states: ^c All.
Wage Record Interchange System 2 (WRIS2)	Adult Education and Family Literacy Act and State Vocational Rehabilitation Services Program	WRIS2 facilitates access to UI wage data to satisfy reporting and performance requirements as well as research and evaluation.	Wage data, employee names, and SSNs	State agency holding wage data, PACIA, ETA. Participating states: 36.
Federal Employment Data Exchange System (FEDES)	Primarily Title I Adult, Dislocated Worker, and Youth; Wagner-Peyser Employment Services	FEDES provides participating states with federal employment and earnings data not available through other exchanges, from the Office of Personnel Management (OPM), the U.S. Postal Service (USPS), and the U.S. Department of Defense (DOD) for authorized use, such as performance reporting and evaluation.	SSNs, date of employment entry, employment placement and retention and average earnings	States, OPM, USPS, and DOD. Participating states: 43.

Source: GAO analysis of DOL documentation.

^a A PACIA is designated by the governor to be responsible for coordinating the state's program for evaluating training provider performance.

^b Although ETA is a party to the WRIS and WRIS2 agreements, it does not have access to the data states share, as its role is administrative.

^c For the purpose of the table, the term "participating states" also includes the District of Columbia and Puerto Rico.

DOL Currently Funds the Sharing of Wage and Employment Records to Assist States in Performance Reporting (cont.)

- Not all states exchange data through these federal systems. Staff turnover or resource constraints may make it difficult for some states to participate, according to contractors for the Federal Employment Data Exchange System.
- State agencies that do not participate in the federal data exchanges may gather necessary performance information through a variety of methods. For example, in reporting guidelines for the Adult Education and Family Literacy Act program, federal officials suggest negotiating individual arrangements to share data with other entities.

DOL Currently Funds the Sharing of Wage and Employment Records to Assist States in Performance Reporting (cont.)

- Participating states exchange PII when accessing wage record data through federally-funded data exchange systems. Specifically, states input individual SSNs when they query the wage records using WRIS¹⁰, WRIS2, and FEDES in order to match participant records.
- The data exchange systems return individual-level wage records to the participating state agency.¹¹
- WRIS2 also allows aggregate reports to be shared with third-party entities, such as public agencies and private schools, for the purpose of meeting program management requirements, provided the third-party has entered into a formal agreement with the state agency participating in WRIS2 that incorporates the confidentiality guidelines of that state.

¹⁰ WRIS is built upon the Interstate Connection Network (ICON) used for the administration of interstate unemployment benefits.

¹¹ According to DOL guidance for the Unemployment Insurance program, wage records include an individual's wage amount, an employee identifier (name or SSN), and an employer identifier (name or account number). In addition, wage records may include employer address and the reporting period.

Federal Data Systems Used for Performance Reporting Primarily Have Data on Program Outcomes, with Limited or No Personally Identifiable Information

- The DOL and Education performance reporting data systems do not maintain PII, such as names or SSNs, with the exception of the system serving the VR program.¹² Accordingly, the agencies have designated most of these data systems as low risk in terms of the potential harm that could result from improper PII disclosure, with the VR program's system being moderate risk.¹³
- However, some of these systems maintain individual-level information that is not identifiable, such as unique identification codes instead of SSNs.¹⁴

¹² The VR program collects PII at the federal level to perform queries on the data, which are then aggregated (removing PII) and used for research and evaluation purposes. In addition, while the other federal data systems included in this review do not hold PII, the individual data systems that states use to track program data may hold PII.

¹³ The risk-level assessment is based on the National Institute of Standards and Technology (NIST) Special Publication 800-122, Guide to Protecting the Confidentiality of Personally Identifiable Information. This publication advises agencies to designate data systems according to a low, moderate, or high confidentiality impact level, which is the potential harm that could result in the event of improper PII disclosure.

¹⁴ According to DOL officials, when states submit data on individual participants, they are prevented from transmitting PII such as SSNs. There are edit checks built in to DOL's data systems that recognize SSNs and reject files with these data.

Federal Data Systems Used for Performance Reporting Primarily Have Data on Program Outcomes (cont.)

- DOL uses one major data system, the Enterprise Business Support System (EBSS), with two main components: one where states submit the data and another that tests the data before producing reports, as shown in table 2.
- Education uses separate data systems for its two core programs, as shown in table 3.



Table 2: U.S. Department of Labor Data Systems Used for Performance Reporting on Core Programs

Name	Purpose/Use ^a	Examples of Types of Data Elements	Aggregate or Individual Data?	Access	Agency-Designated Risk Level ^b
Enterprise Business Support System (EBSS)	EBSS is a management tool that assists with the review and analysis of program data.	Employment entry and retention, average earnings, credential rates, credential attainment, literacy and numeracy gains.	Aggregate—no personally identifiable information (PII)	Approx. 225 users including: State Grantees, Employment and Training Administration (ETA) Regional Federal Project Officers and Managers, and ETA Program Office personnel.	Low
Enterprise Data Reporting and Validation System (EDRVS)	A component of EBSS, EDRVS allows the states to review and validate their WIA reporting data before final submission to DOL.	Employment status, occupational codes, wages, credential attainment, literacy and numeracy gains, test dates.	Individual—no PII	Same access as EBSS.	Low
Data Management Reporting System (DMRS)	A component of EBSS, DMRS collects, maintains, and electronically verifies program performance data.	Same data elements as EDRVS.	Both--no PII	Approx. 1460 users--all ETA employees.	Low

Source: GAO analysis of DOL documentation.

^a These data systems are used for the following core programs administered by DOL: Title I Adult, Dislocated Worker, and Youth; and Wagner-Peyser Employment Services.

^b The risk-level assessment is based on the National Institute of Standards and Technology (NIST) Special Publication 800-122, Guide to Protecting the Confidentiality of Personally Identifiable Information. This publication advises agencies to designate data systems according to a low, moderate, or high confidentiality impact level, which is the potential harm that could result in the event of improper PII disclosure.



Table 3: U.S. Department of Education Data Systems Used for Performance Reporting on Core Programs

Name	Purpose/Use	Examples of Types of Data Elements	Aggregate or Individual Data?	Access	Agency-Designated Risk Level ^a
National Reporting System (NRS)	NRS identifies and defines measures for national reporting on program outcomes for the Adult Education and Family Literacy Act Program.	Number of participants, educational functioning level and gains, date entered employment, employment retention, GED or secondary diploma obtained.	Aggregate—no personally identifiable information (PII).	Role-based access for state agencies, Education administrators, and public users.	Low
Rehabilitation Services Administration Management Information System (RSA-MIS)	RSA-MIS collects information from VR grantees regarding performance and financial information for the VR Program.	Demographic information—including SSN and date of birth, disability information, services received, education, employment, earnings.	Both—includes PII.	All state VR agencies and RSA staff, in addition to the public, can access, but not edit, aggregate state reports (without PII). Otherwise, few RSA staff have role-based access to sensitive information.	Moderate

Source: GAO analysis of Education documentation.

^a The risk-level assessment is based on the National Institute of Standards and Technology (NIST) Special Publication 800-122, Guide to Protecting the Confidentiality of Personally Identifiable Information. This publication advises agencies to designate data systems according to a low, moderate, or high confidentiality impact level, which is the potential harm that could result in the event of improper PII disclosure.



Objective 2: What challenges to performance reporting have been previously identified by federal auditors and what challenges are anticipated?

- Various Challenges, Including Those Related to Data Quality and Sharing, Have Been Identified
 - Previously Identified Challenges to Reporting, Including Those Related to Data Consistency and Validation, Could Continue
 - Under WIOA, Additional Changes and Challenges to Performance Reporting Are Anticipated for States
 - Federal Agencies Are Developing Policies to Help Implement WIOA Performance Reporting



Previously Identified Challenges to Reporting, Including Those Related to Data Consistency and Validation, Could Continue

- In prior work, GAO and federal IGs have highlighted various challenges in reporting reliable outcome data related to job training. Several of these challenges could continue as the agencies implement WIOA, according to IG officials and representatives of state agencies. For example:
 - Consistency of data: Along with the DOL IG, we reported in December 2013 that flexibility in DOL's guidance for defining program participants and key dates, such as program exit, had led to inconsistent and incomplete data reporting by states. We recommended that DOL provide additional guidance to improve the consistency of data reported by states. In response, DOL indicated it planned to work on additional guidance to clarify areas open to interpretation.¹⁵

¹⁵ GAO, *Workforce Investment Act: DOL Should Do More to Improve the Quality of Participant Data*, GAO-14-4 (Washington, D.C.: Dec. 2, 2013); DOL OIG, *Audit of Workforce Investment Act Data Validation for the Adult and Dislocated Worker Programs*, 03-09-003-03-390, (Washington, D.C.: Sept. 30, 2009).

Previously Identified Challenges to Reporting (cont.)

- Data validation: In December 2013, we also reported that while DOL enhanced its oversight efforts by having a data contractor produce quarterly reports on data issues and requiring states to validate their performance data, the agency had not established a process to review the results of these efforts and resolve systemic data quality issues. We recommended that DOL promote a formal process for improving data quality, including evaluating data validation efforts and sharing findings. In response, DOL indicated it plans to analyze data validation results and share promising practices.¹⁶
- Resource and privacy issues: In January 2014, we reported that collecting performance data on credential attainment can be resource-intensive because case managers must manually collect this information from various sources, and that some potential sources do not share data due to privacy concerns.¹⁷

¹⁶ GAO-14-4.

¹⁷ GAO, *Workforce Investment Act: Strategies Needed to Improve Certain Training Outcome Data*, GAO-14-137 (Washington, D.C.: Jan. 31, 2014).

Under WIOA, Additional Changes and Challenges to Performance Reporting Are Anticipated for States

- Establishing Data Sharing Agreements:¹⁸ While some states currently collect wage and employment data through various methods for Education programs, including follow-up surveys of participants, WIOA will require all core programs to use quarterly wage record data for reporting in a manner consistent with state law. This change could present a challenge for education programs not party to a data sharing agreement. For example:
 - For the Adult Education and Family Literacy Act Program, 16 states relied on participant survey data to obtain some or all of their outcome data as of the 2013-2014 program year.
 - For the VR program, according to federal officials and representatives of state agencies, state agencies have not needed to conduct data matching to obtain information on employment and earnings because counselors were in regular contact with participants and their employers until a case was closed and thus could readily obtain that information for participants. Under WIA, counselors also did not need to report on employment and earnings after a case was closed, whereas such reporting will be required under WIOA.

¹⁸ Here we note preliminary issues about state implementation raised by the federal officials and state associations we interviewed. In our final report, we will further describe challenges selected states face related to performance reporting under WIOA.

Additional Changes and Challenges for States (cont.)

- Establishing Data Sharing Agreements (cont.)
 - Challenges to sharing data may make it difficult for some states to obtain necessary data for performance reporting, according to several federal officials and representatives of state agencies we interviewed. For example:
 - Some state workforce agencies do not have working relationships with their state agencies administering the Adult Education and Family Literacy Act and VR programs, potentially making dialogue about sharing employment and training outcome data difficult.
 - Some states may have privacy laws that restrict data sharing. Thus, states would be responsible for establishing practices that comply with both state and federal law.

Additional Changes and Challenges for States (cont.)

- Establishing Data Sharing Agreements (cont.)
 - Some state unemployment insurance agencies may not have the staff and technical resources to respond to requests from a potentially larger group of programs seeking wage records.
 - According to federal officials, aging UI data systems may also complicate state efforts to report on performance for WIOA programs as more agencies seek wage records from these systems. In our past work, we noted that the results of a state survey regarding UI data systems found that the age and outmoded aspects of these systems have affected their ability to efficiently address workload demands.¹⁹
 - In addition, there may be financial resource concerns, as DOL officials told us the state agency holding wage data is not permitted to use the state's unemployment compensation grant toward the costs of sharing wage data for purposes that do not benefit the unemployment compensation program, such as workforce program performance reporting.

19 See, GAO, *Information Technology: Department of Labor Could Further Facilitate Modernization of States' Unemployment Insurance Systems*, GAO-12-957, (Washington, D.C.: Sept. 26, 2012) and GAO, *Unemployment Insurance Information Technology: States Face Challenges in Modernization Efforts*, GAO-13-859T, (Washington, D.C.: Sept. 11, 2013).

Additional Changes and Challenges for States (cont.)

- Data system modifications:
 - All of the representatives of state agencies we spoke with about anticipated challenges said that a lack of resources such as time, staff, and funding may make it difficult for states to apply changes in federal data systems to their various state data systems in order to submit required data.
 - In particular, states may have limited lead time to modify data systems because they will likely wait for federal regulations to be finalized, according to most of the federal officials and representatives of state agencies we interviewed.
 - DOL officials also noted that states generally have separate data systems for core WIOA programs, as well as UI wage data systems, and that these systems vary widely across states. DOL and Education officials noted the need to work with state agencies and other partners to integrate their data systems to ensure accurate data collection and facilitate compliance with performance reporting requirements.

Federal Agencies Are Developing Policies to Help Implement WIOA Performance Reporting

- Education and DOL jointly issued proposed regulations in April 2015 that the agencies intend, in part, to address some of the challenges with performance reporting, although final rules may differ as they may incorporate changes based on input from the public comment process.²⁰ In addition, the agencies issued a proposed performance reporting template in July 2015.²¹
- DOL also issued a letter in February 2015 encouraging states to build and strengthen partnerships across agencies administering core programs. The letter also outlined DOL's vision for states to align program accountability and data systems to support program management and inform policy.

²⁰ See 80 Fed. Reg. 20,574 (Apr. 16, 2015).

²¹ See 80 Fed. Reg. 43,474 (July 22, 2015).

Appendix I: WIA Performance Measures Currently Used for the Core Programs

States will be reporting under WIA-related guidelines until 2016. Using waivers, DOL provided states with the option of reporting on a set of common measures instead of a list set forth in law in an effort to help minimize reporting differences and performance requirements across workforce programs. For the Title I and Wagner-Peyser Employment Services programs, almost all states were using the common measures by program year 2013. The following information represents the currently used performance measures for the six programs we reviewed, according to agency documentation.

Appendix I (cont.)

Department of Labor Programs

- Common Performance Measures for Title I Adult and Dislocated Worker Programs and Wagner-Peyser Employment Services
 - Entered Employment: (Of those who are not employed at the date of participation) Number of adult participants who are employed in the first quarter after the exit quarter divided by the number of adult participants who exit during the quarter.
 - Employment Retention: (Of those who are employed in the first quarter after the exit quarter) Number of adult participants who are employed in both the second and third quarters after the exit quarter divided by the number of adult participants who exit during the quarter.
 - Average Earnings: (Of those adult participants who are employed in the first, second, and third quarters after the exit quarter) Total earnings in the second plus the total earnings in the third quarters after the exit quarter divided by the number of adult participants who exit during the quarter.

Appendix I (cont.)

- Common Performance Measures for the Title I Youth Program
 - Placement in Employment or Education: (Of those who are not in post-secondary education or employment (including the military) at the date of participation) 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 number of youth participants who exit during the quarter.
 - Attainment of Degree or Certificate: (Of those enrolled in education at the date of participation or at any point during the program) Number of youth participants who attain a diploma, GED, or certificate by the end of the third quarter after the exit quarter divided by number of youth participants who exit during the quarter.
 - Literacy and Numeracy Gains: (Of those out-of-school youth who are basic skills deficient) Number of youth participants who increase one or more educational functioning levels divided by number of youth participants who have completed a year in the program (i.e., one year from the date of first youth program service) plus the number of youth participants who exit before completing a year in the youth program.

Appendix I (cont.)

Department of Education Programs

- Adult Education and Family Literacy Act Program
 - Entered Employment: The percentage of unemployed adult learners (in the workforce) who obtained a job in the first quarter after program exit.
 - Retained Employment: The percentage of adult learners who retained employment in the third quarter after program exit.
 - High School Completion: The percentage of adult learners who earned a high school diploma or its recognized equivalent after program exit.
 - Entered Postsecondary Education or Training: The percentage of adult learners who entered postsecondary education or training after program exit.

Appendix I (cont.)

State Vocational Rehabilitation Services Program

- Change in Employment Outcomes: The difference between the number of individuals exiting the VR program who achieved an employment outcome during the current performance period and the number of individuals exiting the VR program who achieved an employment outcome during the previous performance period.
 - Percent of Employment Outcomes: The percentage of individuals exiting the program during the performance period who have achieved an employment outcome after receiving services.
 - Competitive Employment Outcomes: The percentage who exit the VR program in employment in integrated settings with or without ongoing support services, self-employment, or Business Enterprise Program employment with hourly rate of earnings equivalent to at least the federal or state minimum wage rate, whichever is higher, based on all the individuals exiting the program who have achieved an employment outcome after receiving services.
 - Significance of Disability: The percentage of those individuals identified in the “competitive employment outcomes” measure who have significant disabilities.
 - Earnings Ratio: The ratio of the average hourly earnings of all individuals in competitive employment to the average hourly earnings of all employed individuals in the state.
 - Self-Support: For those identified under the “competitive employment outcomes” measure, the difference in the percentage of individuals who at program entry reported their income as the largest single source of support, and the percentage that reported their personal income as the largest single source of support at program exit.
 - Minority Background Service Rate: The ratio of the individuals with a minority background to the individuals without a minority background exiting the program who received VR services.
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Enclosure II: List of Organizations Interviewed

Council of State Administrators of Vocational Rehabilitation – represents chief administrators of the public rehabilitation agencies serving individuals with physical and mental disabilities in the states, District of Columbia, and the territories.

Data Quality Campaign – a nonpartisan nonprofit agency that collaborates with organizations at the national, state, and local levels to translate lessons learned into policy actions that support effective data use from early education to the workforce.

Jacob France Institute – housed at the University of Baltimore, the institute is sub-contracted by the State of Maryland Department of Labor, Licensing and Regulation to manage the information technology aspects of the Federal Employment Data Exchange System.

National Association of State Workforce Agencies – represents state administrators of unemployment insurance laws, employment services, training programs, employment statistics and labor market information.

National Association of Workforce Boards – represents state and local workforce development boards in an effort to ensure that workforce development and job training programs meet the needs of employers.

National Council of State Agencies for the Blind – represents state administrators of rehabilitation services for the blind and serves as an advisory body to federal agencies as they develop related policies.

National Council of State Directors of Adult Education – represents state directors of adult education on relevant legislative and policy issues.

Xerox Corporation -- provides information technology support services for processing the unemployment insurance claims for interstate benefits through the Interstate Connection Network contract administered by the State of Maryland Department of Labor, Licensing and Regulation. This network supports the Wage Record Interchange System (WRIS) and WRIS2.

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