**WorkforceGPS**

**Transcript of Webinar**

**Data Integrity Technical Assistance Tool: Report Analysis for WIOA Titles I and III**

**Tuesday, August 18, 2020**

*Transcript by*

*Noble Transcription Services*

*Menifee, CA*

JONATHAN VEHLOW: Welcome to "Data Integrity Technical Assistance Tool: Report Analysis for WIOA Titles I and III." So without further ado, I'd like to kick things off to our moderator today, Christina Eckenroth, workforce analyst, U.S. Department of Labor, Employment and Training Administration. Christina?

CHRISTINA ECKENROTH: Thanks, Jon. So thank you and welcome, everyone, to today's event. A quick reminder before we get started that if you appreciate our event, please stick around to let us know. There will be a survey at the end of the webinar. And if you like these events, it's especially important to let us know. And if you don't, well, we want to hear from you too so that we can improve.

OK. So now on to today's event. So quarterly report analysis is a data integrity technical assistance tool that's meant to fit into and support your state's broader data integrity efforts, including data validation. So let's take a look at the full responses. Jon, can you bring the full results up?

MR. VEHLOW: Yep. One second here. Bringing those up for you, Christina.

MS. ECKENROTH: Great. Thanks.

MR. VEHLOW: There we are.

MS. ECKENROTH: Thank you. So let's take a look at the full responses. How many of you are pretty familiar with the data validation guidance? OK. It seems like most of you are familiar with that guidance. And for those of you who aren't, no problem at all. We're going to have links to that; you can go ahead and check it out for yourself.

So how about the quarterly report analysis? So the ETA regional offices sent the tool containing the quarter three data to states in July. So how many of you have had the chance to review it? Well, it looks like a fair number of you have reviewed it or are interested but, like, that's not your job. So that's perfectly fine. This is a great presentation for you.

This presentation will be an opportunity to introduce some folks to the tool and its purpose, and address questions for those of you who are a little bit more familiar with it.

Thanks, Jon. We can bring the poll down. (Pause.)

So today you're going to hear from Cesar Acevedo and Robert Hoekstra. They're both with the U.S. Department of Labor and they led the development of this tool.

Now, as I mentioned, in this session we will introduce you to the quarterly report analysis technical assistance tool approach. We're going to show you an example of the report, discuss the pilot phase, and then we want to hear from you.

I'm going to pause right here for a couple of resources that you might find helpful to reference for today. And Jon indicated there are some QRA examples in the file share, so you might want to download those. And if you wanted to check out the data integrity link on our website, you can access that in the welcome chat.

So throughout today's presentation you'll hear about the quarterly report analysis technical assistance tool and how your state may use it to improve data integrity efforts. So the QRA is a part of DOL's efforts to support states in reporting valid and reliable data, as required by WIOA Section 116.

The QRA aligns with the data validation framework and the guidance that we issued in – joint guidance with the Department of Education, so that was TEGL 7-18; as well as the DOL-specific guidance that we issued for Department of Labor programs, and that's in TEGL 23-19. So those are the links. If you were one of those folks that wasn't quite familiar with that, you can access those on our website.

Now, Cesar will review the vision of the QRA a little bit more in depth. So I'm going to turn it over to you now, Cesar.

CESAR ACEVEDO: Thanks, Christina. Let's go to the next slide, Jon. Or I guess I'll drive slides from here on out. Thanks, Christina.

So the QRA – quarterly reporting analysis – is an extension of our data-driven technical assistance approach. So for those of you that are familiar, beginning about a year, maybe two years ago now, we started out with some peer learning group calls that were really well received. We did some deep dives into measurable skill gains, took a look at what the data was telling us about your reporting habits and ways that we thought performance could be improved simply by just sharing this data, the visualizations, with you.

That kind of spurred what this QRA could turn into. That, coupled with the success of the TADI (ph) in trade, kind of inspired the QRA. So we'll think that a lot of the documents that we share today and the way we talk about things would be really familiar to you all.

As Christina mentioned, this tool will be used – sorry, I'm missing my spot here. It'll be used for ongoing compliance monitoring by our colleagues in the regions, as well as supporting you all in the state as you embark on your own data validation efforts.

It was composed – this work – we composed a work group of representatives from our Office of Workforce Investment, my office, and the Office of Policy Development and Research, as well as Robert and others in the Office of Trade Adjustment Assistance, to develop the QRA, develop the targets and how we implement the product.

So for here, we're providing a grantee-focused technical assistance tool, right? Beginning with the Title I and III data, the QRA will serve as a technical assistance tool for grantees to identify areas in their reported data that may require additional attention or correction. And these are the things that we're hoping will support your in-state data validation efforts.

On top of that, the QRA will inform our ETA monitoring activities by highlighting areas of concern for additional investigation with our regional performance specialists and the FPOs.

The idea is that grouping together these two efforts with the same tool standardizes the way we discuss the information, the way we visualize it.

And coupled with the formal guidance, the QRA can support the grantees' data validation processes by offering an additional tool to inform those quarterly assurance – data quality assurance activities and make sure that you're aware of potentially significant data reporting errors or things that just require additional communication with us at ETA.

The ultimate objective is to provide notice to the grantees of quarterly performance issues which may impact their annual performance reports and to keep regular – keep a regular conversation going about these data quality efforts.

This is a visual of our three-tiered approach for data integrity at ETA so far. You'll notice WIPS is our first tier there on the left. It helps us identify – helps states identify and address their issues. WIPS ensures that the calculations are standardized and accurate.

The state data validation requirements set in the guidance established the parameters for states to ensure that their submissions conform to the required documentation.

And then this third level, which is where the QRA fits in, will provide a system-wide view that alerts us all to state anomalies and outliers that may otherwise be difficult for individual states to identify, or even folks in the regions, where we're not necessarily looking at things from a national or aggregate perspective. That's what the QRA does is it's going to help us identify some of those potentially systemic issues.

So we're providing these aggregate views and where the state doesn't conform to our expectations the state should go to the individual records and identify and correct those issues. Or it could just not – it might not be an issue. The data might be valid. We'll provide some examples of those in a few minutes.

But there's very real scenarios where a state falls outside of our expected parameters and the data is valid and it's a valid reason; it's just a weird anomaly that happened that quarter or something that will be corrected in subsequent quarters.

Providing this notice to the grantees will hopefully impact their annual performance and then also help support (our new fiscal ?) model of making sure we're feeding in standard and accurate data.

So the data elements that we selected – they're all related in this first phase – are related to eligibility, performance outcomes, and other program requirements. We identified some things that are priorities for the agency at the moment, things like eligible – sorry, not eligible training providers.

It's when they're related to training and priority of service. Those are things that are a priority at the moment and we want to make sure that states are adhering to the requirements for priority of service and that also we are keeping an eye on how employment is related to those training services.

Additionally, the targets we developed as a group here at ETA, at this point they're just reference points to serve as a technical assistance guide to demonstrate our expectations. Like I said, if you fall out of those, at most it is requiring that you engage with us in a conversation about the data, or at least getting you to take a second look at the data that you're submitting.

The other thing that we like about this approach, similar to how things are done with the TADI, is that we can sort of be flexible and adapt the – and revise these targets as time goes on. Things can shift nationally or our expectations could have been off base and we can shift those pretty easily as well. But I think typically we'll be reviewing targets about every year or so.

With that I'm going to turn it over to Robert and he'll talk us through a few examples or provide some visuals over what the QRA results look like.

ROBERT HOEKSTRA: Thanks, Cesar. We're just going to take a quick minute to talk about what the format is. You can see a couple of screenshots here, but I'll also encourage people to look in the file share. We have examples for the four programs that you can open up.

There are four different tabs to the workbook that we provide. That includes instructions as well as the dash tab, which is what you see on the left-hand side of the presentation, where you get a bar for each state. The blue bars are for each state in – well, across the nation, and the yellow one is your state so you can kind of see where you are relative to everyone else. The red line is the target that we've established so you can see how you relate to that target.

On the bottom you can see the results tab. In the results tab you can see a trend across the four quarters of the program year of your results over time. And there are columns to the right of each of those percentages with your numerator and denominator. And we hide all of the prior quarters, but you're welcome to unhide those in Excel to be able to see those if you're looking back over time.

We do put some comments in there. So for example, on the dates at the top we do tell you what date we ran it. So if you're wondering what data we're using, you can see that as a reference. And then you can see there's also a tab for descriptions, where we provide an explanation of all the measures we do, an explanation as to why we're looking at it and what group we're looking at, as well as specifications – SQL specifications for the numerator and denominator. So if you're looking at recreating this in your own system to understand your own results, that information is there.

And I'm going to kick it back over to Cesar.

MR. ACEVEDO: Thanks, Robert. So the idea here is to foster continuous improvement, right? We have this feedback cycle that the QRA will fit neatly into. States will submit their quarterly reports. Shortly thereafter, ETA turns around the QRA results. States will provide feedback on those results.

And based on that information, ETA will make changes; states will make changes to future data submissions. And we can also, based on some national attributes, we can implement specific TA efforts or products to help improve those future data submissions.

So here is our timeline or our implementation plan so far. As Christina mentioned, we did share the results with states in July. We are in the process of identifying pilot states. There are a number of you so far, so that's great. We're getting really good feedback and some enthusiasm about the product.

And then from there we're going to engage in feedback, both on the product itself, how we've implemented it; but then also we're looking to hear from you at the states on those specific results and where things – where results might have fallen outside of our expectations at ETA.

And so throughout the process ETA is going to continue to iterate and revised the QRA products based on the feedback that we receive throughout ETA and folks in the regions that are going to use and then also for you all at the state.

These are our expectations for DOL. We're going to disseminate the state-specific QRA results to the appropriate staff in each state. You should get those from your regional offices. We're also going to review the QRA results to inform those conversations with states regarding data integrity efforts and to inform regular grant monitoring efforts.

You might hear from your regional performance specialist on any especially notable or troublesome results. But so far I think those have been few and far between. And then also you'll respond to the regional specialist with any state responses to the individual metric results, and also with overall feedback on the product.

We're collecting all that stuff here at the national office and we'll be working on the QRA in the coming months as well.

As for the grantees, we're hoping that all states will at least review the QRA results, right? At the very least, it's another tool, another visualization in your pocket that you can use as you see fit in your data validation efforts at the state. Hopefully you're making necessary changes to improve the QRA results.

For those volunteer pilot states, the commitment is mostly on the responses and in the timing of those responses. So we're hoping that you'll commit to reviewing the QRA results in a timely manner and providing feedback on the QRA product itself, in addition to any failed metrics.

With that, we blazed through the presentation so that we can handle as many questions as we can get to. So we'll take a quick second to regroup and then we'll start answering the questions that are in the chat. I think we have a handful already.

MR. HOEKSTRA: All right. So we're going to kick off from the top. Our first question we got is, "Why does DOL not integrate the QRA and TADI into WIPS where we could already run these checks?" There's a couple of reasons for that. One is we do need to use this as a snapshot in time to trend over time. And it's valuable to see – to look across states at the time the state submits that we may not have enough other states to give you a cross-comparison.

I will also say this mechanism gives us both flexibility to be able to roll out measures really quickly so that if there are new emerging data issues we can get them addressed rapidly. And it also means that we can start a conversation. If you're just filling out a form in WIPS, it doesn't create a dialogue; whereas when we get these emailed responses back from pilot states, it really is a prompt for us to be able to have an ongoing technical assistance discussion.

Second question we got was, "Why is there a 250-character limit on the resolution?" So we do ask states to have the resolutions for pilot states when you are providing those responses. Limit them to 250 characters. That makes it so that we can quickly understand what the issue is and determine whether or not there is follow up needed or ongoing technical assistance needed.

As you can imagine, on our end we are going to be reviewing hundreds and hundreds of these. So it's really important to have a clear, concise explanation about what's going on rather than really long explanations. Now, that doesn't mean you cannot provide further explanation. And I'm hoping that the ongoing dialogue after we receive those responses will help us get those explanations together.

The next question is, "Are we using only certified files?" And that's correct. So we don't do any of this evaluation until you have certified the file and it is your official data. We want to give states an opportunity to work with their own data as much as they need to ahead of time. And then we provide those results only based on certified state results.

The next question is, "Will states be able to pre-evaluate their profiles as they do in TADI?" So we do provide the SQL for numerators and denominators. We really encourage states to be able to rebuild or model what our calculations are so you guys can dig into it.

But I will say there's a couple of distinctions between the TADI and QRA. We are not going to be providing a self-check at this time. I know that's been helpful in TADI but it's a much smaller file which facilitates that. But the measures are also different. Your QRA tends to be big aggregate measures where looking at individual records isn't necessarily the best way to troubleshoot these.

And so we want to move a little bit away from TADI model where you're saying here are our five error records, to a model of comprehensively looking at these data trends and seeing if there is underlying issues that should be being addressed.

The next question is, "How was the methodology behind – what was the methodology behind coming up with targets?" So a lot of this is just based on national averages. You can see on most of the charts as you put through there's a natural separation point between states. And also, you can look at the descriptions tab for each – or some of them. We had specific reasons, specific citations as to why we expected over a certain threshold.

So the idea of the targets is really to identify those outlier states. And so it's all about where everyone is kind of sitting when we establish those targets.

MR. ACEVEDO: Our next question someone asked, "In looking at our state results, we are questioning why 'other reason for exit' was chosen as a measure and why 99 percent was set as the target. This number is not something case managers can change."

So all that's true. We did select "other reason for exit" because it does have performance implications for us at the national level and for you all at the state. Having a reason – having an "other reason for exit" excludes that individual record from all performance measures, so we want to make sure that that's being used appropriately.

Additionally, why the target was set as 99 percent, as Robert just mentioned, that's where the national averages fell.

Now, things can fluctuate, especially as the participant counts get kind of small. I know one question we fielded earlier this week was about the youth measure being set at 99 percent. And that's something we can look at in the future, especially with youth having a smaller exiter count; it tends to fluctuate a little bit more.

But overall, 99 percent was the national average across all the programs. And so I think it has that performance implication and then it also just has a monitoring implication for us as well.

So our next question, "QRA results were shared in July. Where and how was the QRA shared?" They were shared in July. What date they went out might have varied by region, but you should have received – state performance contacts would have received the QRA results from someone at the regions I think in the last week of July.

We have been fielding requests for pilot volunteers. That request would have been sent at the same time as the QRA results. But if you are interested in being a pilot state, please just reach out to your regional performance specialist, your regional performance contact, and they'll get you set up and put on our list.

Next question, "Will states receive the QRA every quarter even if they are not a pilot state?" The answer is yes. We will produce these results for every state that has a certified file for WIOA Titles I and III. You should get this result a few weeks after the quarter reporting deadline.

And our next question, "The data integrity tool covers a quarter in –" there's a typo in there "– so changes implemented with the date could have already occurred if current quarter correct. Therefore the response might be that the data has been corrected in a future quarter."

Yes. So the QRA will reflect the quarterly snapshot that you sent us – that the states submitted at a certain time for that quarter. It is possible that you've found some issue and corrected it. If that issue results in a failed measure, then please just put that correction in the response. Let us know that it'll be fixed the next quarter and we'll move on from there.

MR. HOEKSTRA: So I'm just going to add on to that and say, the goal of QRA is to get flow progress over time. So we're not expecting it affects everything in one quarter. We're not expecting you to be able to say, this is exactly the things we changed. We just expect that number to go up and to explain to us what – and if you're a pilot state, explain to us what your process is for getting that to go in the direction it should be going.

So next we had a – so, "Can you explain (simply ?) what 'other reasons for exit' in the youth QRA really means?" So there can be valid reasons for "other reason for exit." We just want to make sure it's not being over-reported. If you know that your records are validly reported that way, you may be below that target percentage and that's perfectly fine.

It's just an indicator that you should be looking at it because you have a higher percentage of other reasons for exit or a lower non-other reasons for exit percentage than most other states, and we want to make sure that's valid data.

The next question was, "The national trend may produce a target which is higher than a specific state's goals in this element category." So since we don't – so none of these are based on performance measures, so there is no particular state-specific goals. You may have a particular goal that's not – that you are using in your state that doesn't align with what the target is in our QRA and that's mostly fine.

Obviously, what we're trying to do is identify outliers. So if there is something going on in your state that's unique, that's also some really great information for us to have so that we understand why your state is an outlier from other states.

Next question, "There is some yellow in our QRA. Is there a leeway for each measure?" So there's no built-in leeway for each measure. Yellow just indicates you were within 5 percent. So we do give that visual indicator that you were close but not quite there. You're not significantly off where our expectation is.

But it is treated the same way as a red. So if you are a pilot state, we would hope that you would respond to that. It just gives you an indication that you're close.

In the quarterly results, if we have a state program result that requires a resolution, can we get a list of the participant identifiers? So that is a really great question. And we cannot provide a list of participant identifiers, partly because we are concerned with PII issues on identifiers. But also, we aren't generally going to be providing a list.

The reason is, as I talked about before, QRA is a little bit different than what you're probably familiar with in TADI, where we're not really saying, here are the specific records; try and figure out what's going on with them. The goal is more holistic. And if we give you a list, especially in some of the larger programs or larger states, of thousands of records, it's not really helpful to you either.

So if you are trying to identify specific records, we really encourage you guys to look in your own data. And use our calculations, which are specified on those descriptions tabs, so that you can see what data elements might be off in your data.

That does lead to me into the next question. All right. I'm being asked to speak slower, so I will do that. Next question is, "How do we get at the file of evaluation SQL?" On the description tab of your results you should see a column H and I which specifies a numerator and denominator SQL calculations that we ran.

Obviously, you do have to make sure that those translate to your system, but they do indicate what the PIRL number is and things like that. So it should be pretty easy for you guys to map into your own systems. And if you have any questions about that, that's obviously something that you can follow up with us about.

MR. ACEVEDO: All right. I'll start with number 16 again. So question is, "It appears adult priority is only looking at three of the items listed in TEGL 19-16. But item four, governor selection, is not included. The goal looks high if just based on three of the five items."

So I will say that there is no way for us to build in a governor-specific selection into the QRA. We just don't have that information at our disposal and we couldn't implement that. But TEGL 19-16, as the number indicates, is a little outdated, although it is still the standing guidance. But the QRA represents sort of our more up-to-date priorities and thoughts of viewing priority of service.

So what you've been doing right now is acceptable. Just know that we're looking at adult priority in a different way now.

Our next question, "If our WIOA adult priority for low-income, basic skills, and public assistance are at 100 percent, how is our WIOA adult priority of service less than 70?" So I assume – I can't see – the person that asked the question did not provide their specific state. But if you like, feel free to send me an email and we can discuss your state's specific results offline. I'm having – without looking at the data, I don't think I can answer this question. So if you sent that –

(Cross talk.)

MR. HOEKSTRA: So I was in the – sorry. I was going to just jump on and say those calculations are actually looking at two very different things. One is determining – so the priority of service is looking at what portion of your priority populations are receiving individualized or career services or training; whereas your specific ones are looking where your denominator – sorry. Let me rephrase this.

One is looking at how many of – how much of your individual and training services are provided to priority service participants. And the other one is looking at how much of your priority service participants are receiving those services.

So you can have a distinction between those two calculations because you're looking at a different subcohort. One is looking at a very small slice and one is looking at the group overall. I hope that's helpful.

MR. ACEVEDO: All right. We'll see if there's a follow up to that later.

Our next question, "For adult, DW, and youth, there are five local workforce development boards who are responsible for the initial eligibility determination, and needs and barriers of the customers seeking training. These are partners in which the state does not have control over policies and procedures to drive daily intake. Is this something that we need to intervene with as a result of the QRAs?"

I'm going to take a beat to think about that for a second. (Pause.) I mean, obviously I think the state should be setting priority of service policies. But I'm trying to see what else we could look – I think it's acceptable for the state to at least take the feedback from the QRA and understand why eligibility determination or who's being enrolled at these five local workforce boards is shaping out the way it is. And find out how to get it aligned – get it aligned with ETA's priorities and WIOA's priority of service requirements.

(Pause.) Still thinking a little bit about that question. I think we can – we'll come back to it if we get some other thoughts.

Our next one, "Arizona does weekly WIPS cleanup and three weeks before the DOL due date. Then we do daily WIPS cleanup. Also, I test each field on each file." I think this is more of just a comment of how Arizona is approaching data quality ahead of submission.

MR. HOEKSTRA: So I'm just going to add onto that, though. Doing individual data element cleanup is terrific and important for things like WIPS edit checks. But for QRA, remember we're looking across elements and different subpopulations, things that aren't simple rules. If they were a simple rule, we'd be making them as edit checks.

So this is going to take a little bit of a different approach from some of the other data cleanup that you guys have been working on.

The next question is, "Are all the prior quarter results in the national QRA based on prior quarters certified files?" So yes. Each quarterly file results, including in that initial set that we gave you, were raised on prior quarters. So for example, the column that gives you the 9-30-19 quarter was based on the file you submitted for 9-30-19 that was certified.

Next question, "TEGL 23-19 states that grant recipients must describe their data integrity measures, data validation methodology. Are we required to use the QRA product or can you use your own?" So you are not required to use the QRA product. We send it to you, as noted on the last slide, and you can voluntarily be part of the pilot states.

This is not designed to displace your own state data quality measures. This is in conjunction and in addition to your state validation procedures. So you are not required to do it and you should be looking at it comprehensively in addition to your normal data validation procedures.

Next question, "When making adjustments after certification, the WIPS allows recertification. This normally occurs when preparing the final annual report. So how will this be handled?" So we do use the current certification at the run time of the QRA. And as noted, for each quarter you can see a comment on that quarter indicating the run date of it.

We don't recalculate results subsequently. So if you do resubmit, your QRA results are going to stay the same. But remember, what we're looking for is improvement. So resubmission is great. Seeing that data get improved is great. And we are hoping that in the subsequent quarter we will see some of those improvements as well.

So remember, it's supposed to be a snapshot in time of what your data looks like. So we're not going to be rerunning results after resubmissions.

MR. ACEVEDO: And I'll just add quickly that the – I think the benefit of having that extra time for the annual report is that the Q4 QRA could help you improve those – the data that you resubmit for the annual report due on October 1st. So that additional time gives you time to review the QRA for that quarter.

MR. HOEKSTRA: That's great. Next question is, "Will there be a tool provided similar to the TADI tool –" they're talking about the TADI self-check "– we can use to upload the PIRL to see what IDs are in error?"

Unfortunately, because that tool can't really handle these larger files, we are not going to be providing something like the TADI self-check. That's why we're encouraging states to look at those calculations and be able to look in their own systems to see where you might have issues.

And then I'm just going to reiterate that these are mostly things in aggregate and very rarely individual records that are errors.

Next question, "Is there a plan to include financial information in the QRA, similar to TADI?" My short answer is no and probably never, partly because the financial information in TADI is only possible because of TAA-specific data collections on financial elements that aren't used for any other programs. So you won't see something similar in QRA. This is going to be focused just on those profiles.

Next question, "Some of these items are more of an indicator of programmatic guidelines and not data quality. Are we to indicate that the data is OK?"

So there are two different categories of things that end up in here. So it may – so if you are below other states, if you are outside – if you're not normal as compared to the other states, it may be data quality. But it could also be something programmatic. And we're hoping that states will at least take a few minutes to see if there is something that they're doing differently that might be a problem.

So for example, if you really are not doing high levels of priority of service and the data is correct, that's great and good to know. But at the same time, we're kind of hoping states will evaluate why they might be significantly lower than other states on that measure as well.

All right.

MR. ACEVEDO: All right. Our next question, "Where is the individual state information?" So state performance contacts should have received that – the individual state QRA results a few weeks ago. I think we got it out before – we got it out maybe the last week of July. So reach out to your regional performance specialist or your FPO to see if they can resend that if you don't have it.

Our next question, "In Title III the element is listed as 'adult priority' on the descriptions but as 'veterans priority of service' on the results tab. Since Wagner-Peyser is customer choice, is U.S. DOL indicating that Wagner-Peyser should be reaching out to 48 percent of all vets to give them an individualized career service?"

I don't think that's what we're saying. And I think you're pointing out two things here, is that maybe there's a typo or a misaligned title in the document. We can take a look at that for sure. And yes, Wagner-Peyser is customer choice. But I think there is – there's something to be said about state policies that reach out to the appropriate priority populations.

And again, it's not – failing these metrics just means that we have a conversation about them. You discuss with your regional performance specialist and provide a 250-word or less response. We're not talking about failing a priority measure somehow.

So I think – I don't know that we –

MR. HOEKSTRA: So just –

MR. ACEVEDO: Go ahead.

MR. HOEKSTRA: I was just going to add on to that, that you will see between the four different programs that calculations are different. So I think one way to read this question is that you're seeing the first result in two different workbooks being something different. That's intentional. So we tried to tailor the measures to the specific program to make sure that we're giving something meaningful for that program.

So yes, you will see a difference in what the calculations are across the four different programs.

MR. ACEVEDO: Yes, that's correct. The adult priority measures do not apply to Wagner-Peyser. So there is just the veterans priority of service measure that we mostly just track to make sure that veterans are being given some priority.

The next, "Would you prefer one response from each state that includes each program's response protocol for submitting?"

MR. HOEKSTRA: So the cleaner you can make it, I'm sure the regions would appreciate it. But I will say we're going to defer a little bit to the regions. They may – they're going to be the ones you're providing those responses to. And so you might have a conversation with your regional coordinator about the best way they want to receive that back, just so that you guys are all on the same page.

MR. ACEVEDO: Next question, "When will a clear definition for how states should count training-related employment be determined? Some let staff decide. Some do a system approach. Which is the way states should count it?" So that's a good question, one we're hoping that the QRA will help us answer in subsequent quarters.

At this point, ETA has not delivered guidance on how to determine – specifically how to determine employment related to training. And so I think that's something that we'll review and hopefully identify some best practices and get back to you guys.

Our next question, "Will a QRA be developed for JBSG (ph) as well?" I think it's the plan to expand QRA to all ETA and JBSG eventually. But right now, that's not something on the immediate horizon. But the idea is to pilot this with the Title I and Title III programs and see how it applies to the – possibly the discretionary grants and other programs at DOL. So it's not out of the realm of possibility, but it's not something we're talking about now.

MR. HOEKSTRA: So the next question is, "Does the adult priority look at services and training any time during the participation or during the reporting quarter?" So you can see based on the description tab that these are all based on exiters. And so we are looking at the entirely of the participation so that you can satisfy that at any time during a participant's time in the program.

Next question is, "If we're not a pilot state, when will we begin reporting QRA results and corrections back to you?" So right now we don't have a set timeframe for when the pilot – when we'll move from the pilot into the non-pilot phase. But we are expecting that to be quite some time. So nothing urgently coming up, but we do want, obviously, states to be still looking at those results and taking a look at your own data as well.

Next question, "Will COVID or similar issues play a role?" So depending on the measure, I am sure that COVID could have a result – or an impact on your results. It really depends on the kind of measure and that's very specific.

Now, we don't adjust targets because of that specifically, although we are looking, of course, at all states. So if we see moves in state reporting one way – one direction or another, we can revise those targets to address if there is any swing from something else going on that might be affecting it.

"Last day of service with program exit. We use common exit date. Therefore, participant will not exit until all services from all programs have been completed and no future services. Therefore, program that provides the last service has the service that closes."

So this question is related to alignment on the program exit. When you do look at the calculation, you can see that it does count those services across all programs. We tried to be as comprehensive as possible. There are some limitations on some of the reporting.

So for example, if you submit separate files and you are – and that particular program is not required to report on – so let's say you have a dislocated worker and a trade service. The calculation will address if there is a trade service in there. But if you are submitting your dislocated worker file without any of that trade data, you could get a lower result on this just because that data is not being reported to us. The only thing we can look at, obviously, is the data in the file.

Now, that can be a reason why your results are low. Obviously, that is a sufficient response for you to provide back to us, although we're hoping that you will take the additional step and make sure that there isn't anything else going on. Obviously, we also prefer large integrated files, which would also help drive those results up as well.

And someone commented on the current quarter of service we – operates the same way. So the more integrated your file, the better these measures are going to work. But if you are not integrated, that is a sufficient reason and explanation you can provide to us. But we do hope that you make sure there isn't something else going on in your data set.

All right. Next question, "Did you say when we receive a QRA for the Q4 results that have been certified?" So we haven't said when that will happen yet. We are expecting it to happen somewhere around three weeks after the reporting deadline. We haven't set a specific date, but you're probably going to get it early September.

The reason is because we do need to wait enough time to make sure most, if not all, states are in so that you can get that comparison across states. So we do wait a little bit of time before we run those results.

Now I will say, the vast majority of that time is us making sure everybody's in, rather than our own processing time. So obviously if states can get in closer to the deadline, the sooner everybody can get the results.

MR. ACEVEDO: And our next question, "Does DOL intend to create reports for numerators and denominators of these data integrity items?" So I think that's good feedback. Right now the numerators and denominators are available in the comment bubbles, I believe. Or in the – by extending the columns.

So if that's something that you think would be useful to have some other sort of visual or reporting mechanism for the numerators and denominators, feel free to give us some feedback and we can put our heads together and see what works.

Next question, "COVID could affect other reasons for exit. Many have passed away." This is an accurate statement, something that we'll keep an eye on. I don't see us changing the measure or the target at the moment, but if your individual state results are driven by COVID, then by all means provide that response in the QRA.

That is our last question that we have teed up. Anybody else? We'll give some time in case you want to follow up or anything like that. (Pause.)

MS. ECKENROTH: Thanks, Cesar. So while we're waiting for folks to put additional questions in the chat, I'll take this opportunity to remind you of some resources.

So here are some resources that you may find useful when developing your data integrity processes and working with the QRA. Please, as I mentioned before, reference both our data validation TEGLs; 7-18 is the guidance for validating jointly required performance data submitted under the Workforce Innovation and Opportunity Act published in December. That was in joint collaboration with the Department of Education. And TEGL 23-19, which is the guidance for validating required performance data submitted by grant recipients of U.S. Department of Labor workforce programs. And we published that just in June.

Also, there is a new link for data integrity resources on our website and that's here in the PowerPoint.

Any other questions anyone have in the chat? (Pause.) OK. Well, looks like we have addressed most folks' questions right now. But if we have not, if we were not able to address your question today fully or you have a question later on, you can always reach out directly to your regional office contact, as we mentioned throughout the webinar.

Or you know, if you're not sure who you should be talking to, feel free to email our general email box at etaperforms@dol.gov and we will get back to you with a response.

Now another quick reminder. Before I turn it over to close the webinar, another plug for you to hang on and let us know what you think of the webinar. So if you like us, please make sure to tell us in the chat and the survey. And if we can improve at all, we want to be sure you let us know that as well.

OK. Without any other questions I'm going to turn it over to Jon.

(END)