CSAVR

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General Session 4

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>> Welcome back! We're going to get started in about three minutes.

>>BETSY HOPKINS: Hello! Good afternoon. We're going to go ahead and get started. We're going to talk about Data and Performance Accountability after lunch!

>> AUDIENCE MEMBER: Yes!

>>BETSY HOPKINS: This is good, very good! Hello, everyone, I'm Betsy Hopkins, and I am the director of Maine General. Happy to see you all here. I understand people will be coming in probably from lunch and that's fine but we're going to go ahead and get started. I would like to go ahead ‑‑ actually one thing I'm going to do is tell people that the tactical assistance center had booths that they were setting up but they were set up in a separate building and they're going to move over here to the hallway so they should be set up after this session so you will have the opportunity to talk to folks who are working hard for us and with us in the technical assistance centers. Hopefully you will be able to stop by. Without further ado I would like to introduce Melinda Kaufman, who is the Chief of the Data Unit at RSA and Karen Staha, the Director of the Division of Performance Accountability, Employment and Training Administration.

>>MELINDA KAUFMAN: We have the coveted "after lunch" so two hours of performance guidance!

>> AUDIENCE MEMBER: That will keep them awake.

>>MELINDA KAUFMAN: Sounds good. I am Melinda Kaufman, I am the new Chief ‑‑ is that better? All right. I'm Melinda Kaufman, I am the new Chief of the Data Collection and Analysis unit at RSA. I've been with RSA for four months. I started the last week in June which was possibly the best time I could have started because the 911 had already been issued and the regs were sent to the registrar so I missed all that fun but Karen has kept me busy with the performance gazed answer that we hope will be issued soon. It has entered both departmental clearances both Department of Education and labor. We had a call Friday at 4 p.m. to brief them on it, see if they had questions so we could hopefully expedite the process that they go through to clear it. We are hoping to release this soon. It is 70 pages and 10 attachments. I will let Karen introduce herself, we're happy that Karen is here to help us present this presentation.

>>KAREN STAHA: Thank you, Melinda, and good afternoon everyone. First of all, I greatly appreciate the opportunity to join you at this conference. This is the first time I've presented at another system's conference, another program's conference, so an exciting time, lots of good collaboration.

Before I say anything more, I want everyone to give yourselves a round of applause and a cheer!   
(Applause.)

I do that because, A, to wake you up, make sure you are still with us, and also in all seriousness to compliment you. I appreciated listening to the presentations this morning. You are to be commended for the work you do helping people get jobs, the individuals you help and especially with all these new rules and regulations that we're providing to you, I know it could probably be overwhelming at times. It's overwhelming at the federal level I can't imagine at the state and local areas so thank you for all the work you do.

When I got into the area of performance a few years ago I've been in it over ten years and part of it is I like to work with numbers but more importantly it was about the opportunity to tell about the success of our system, how many people got jobs and how many employers found skilled workers. It's really, I tell my staff, we work with numbers but those numbers represent people. I think it's very important to keep that in mind. It should always be the performance is as a result of the success of your program. We're not in it to say "I gotcha!"

Enough of that! I'm going to turn it back over to Melinda and, again, thank you for the opportunity to be here.

Oh, I did want to say we have been working together for over two years between education and labor and we have ‑‑ I can count on probably one hand, maybe two hands the number of times when, in my career at Labor and it's been several years, that we worked in a sustained effort with our colleagues at the Department of Education. We have been at this for over two years now. I've learned a great deal about other programs, specifically vocational rehabilitation and adult education and it's been a great opportunity and I think that the legislation, WIOA presents an awesome opportunity for people to work together to help serve people better.

With that, I'll give it back to Melinda.

>>MELINDA KAUFMAN: And I've changed microphones so can everybody still hear me? I want to talk about today, we're going to go over the major changes to the RSA 911 and then we will get into the performance guidance so the key beginnings that will be outlined in the performance guidance as well as the key indicators of performance. We have done two joint webinars where we talked about these concepts but today we are going to dig deep into VR and talk about how the performance indicators will be applied for VR and how we're going it use 911 to track them. We have four topics we will talk about on subsequent slides with the 911. We are working on an internal training that we will record and make available that will dig deeper into the changes to the 911, we will keep this high level today so we have more time to talk about the performance measures. I do want to highlight on this slide that the RSA 911 policy directive 1604 was released at the end of September. If you haven't you will want to download this and use this version of the 911 and any program changes that you're making or system development. We did have some minor changes between the version released in June and the version released in September. These were nonsubstantive just technical corrections since we weren't able to have that 30‑day comment period after the version in June was released. We did receive questions and comments from our state partners on the document so we did go ahead and make changes where we could, so in the policy directive we've outlined the change that we made and issued the new 911. Quarterly reporting, so up until now you have been submitting your 911 annually beginning with program year 2017 you will be submitting that data quarterly. Unfortunately we will not be able to issue any waivers or accept any delays to the implementation of the data collection instrument. We will need as of November 15th when you submit that first quarterly file, all of your open case data as of July 1st to include all of the required data elements for the new WIOA reporting. We've heard from the WINTAC and had questions in our last joint performance webinar last week about some confusion on the mechanism for reporting the quarterly data. Seems that some states were told or inferred from something that their work force partners said that the quarterly submission will be joint between all of the core programs. That is not the case. You are submitting your files to RSA, they will not be combined with the other core programs. The only thing that will be combined and submitted as one is the annual report and that is something that the work group that Karen and I are on and we will be developing guidance for that in the near future, the annual report.

The new 911 outlines information on internal controls so internal controls ‑‑ and I apologize these next few slides are "reg heavy" the internal controls are to ensure that programs are operating within the compliance and laws and regulations, that the data being reported are reliable so when we report to Congress we trust and know that they're accurate and reliable and that your programs are being run efficiently. We did ‑‑ as a VR agency you're expected to establish internal controls to ensure that the data being reported in the 911 are accurate.

We had over the past couple of years an OIG audit. The OIG investigators went out to a few states, looked at their documentation, the source documents and the 911 and weren't happy with the documentation being provided so we've got some things that we're working on internally, we're going to provide the states with a list of source documents that they need to include in their file. We're working on that now and hope to have it out in the not too distant future. Within the state agencies we need you guys to work on policies and procedures for your internal controls to ensure that the data reported in the 911 are accurate. These would be things like ran dam case reviews, you randomly sample cases, pull them to ensure that there is proper documentation and the case service record matches what's in the case management system. This will be a component of our monitoring and technical assistance program this year. We're also not going to wait until your state is selected to review your internal controls, this will be something that we're doing on a periodic basis over the next couple of years.

The next slide collecting individual data I know you guys have been collecting individual data for the 911 for many years. The purpose of this slide is to highlight that the new 911 is structured so that the data elements are in sequential order, they're grouped at the time in which they should be collected so we've got application section, eligibility determination and IPE, the achievement of the outcome exist and post exist so we're going to highlight that you should be collecting the data at the time that it's requested in the 911 so you don't want to be collecting your IPE elements at application unless you're going to fill out the IPE that day. Mention that in June, between the June and September version of the 9 Len we had some technical and clarifying changes. We keep finding little things that we need to tweak ‑‑ back one side. We keep finding things that we need to tweak in the 911 so we started a list and will provide this to you all formally via email and we will post it on the web page. These are things like with this other support application element 393. In the period between June and September we received a lot of comments that we did not have another support at application, we had is at exit but don't we need it in application to be consistent. We do. Unfortunately when we added it we copied it from the exit and changed it to "add application" however the support at exit elements are all monetary so we want to know the amount of support they're receiving and when they are at application we just want to know yes or no, are they receiving this support. So we have a whole bunch of no questions and the one that is please tell us the amount that they're receiving so that should be a yes or no. If you don't change it in your case management systems that's fine yes or if there is a data that is greater than zero we can put that in, in that case.

Back to element 393 we opted to include this with the other ‑‑ with the at application support, rather than sticking it at the end and we thought it made more sense. Unfortunately that's going to create confusion when we extract the data and send it in so you will have this element 393 in the middle of all the other elements. So what we would like is the extracts to be in numerical order and, again we will put out more details when it gets closer. We have hired a new IT specialist and we are working on our database and extract process and will be providing some additional information for you all so you can design your extract process to meet our needs. We will also be giving you the opportunity to test your extracts with ours sometime over the summer. Item 81, this is another one that changed between the June and September versions because we realized that for the performance measures we really needed a date that you're going to achieve or attain your secondary diploma and as we will talk about later in the presentation, there is a caveat that requires things to happen within a year to get credit for this so it was important to have the date and then finally, the last bullet here, elements 379, 383, 386 and 389 are all the employment first, second, third, fourth quarter after exit. Just wanted to clarify for you here that those people exiting in competitive, integrated employment should be assigned code 4 here. The language isn't overly clear I think because we were trying to be consistent with the PIRL so there should be a tendency to choose 1 which is unsubsidized employment unless it's registered apprentice or active military or competitive integrated employment so we want to make sure everyone is choosing code 4 there and not code 1.

Okay.

>>KAREN STAHA: I'm going to start off the next section on WIOA key terms. I will go over the overall section of the joint regulations and guidance and then Melinda will speak to the VR specific elements that you all will need to report on. The first slide on the WIOA regulations, how many of you have read them? All right! How many of you have looked at them? How many know what they are? I'm just curious how many of you work with anyone from the Title I, the adult dislocated worker youth programs. So we have a few. Good. I think one of the intents of WIOA was to integrate and streamline that collaboration at the service delivery level to help better serve people and give them more robust set of services. I think as challenging as it's been to develop and employment this performance accountability ‑‑ these provisions, I think it really in the end, I believe it will help that everyone is measuring outcomes the same way, that you're counting people the same way, calculating the outcomes the same way to be able to help one another.

I remember years ago when I first started with WIA performance with we counted up there were like across different programs in the Department of Labor there were eight or nine ways of defining entered employment. So that really inhibits collaboration when, oh, well I've got to measure it this way and collect this information and this way we are all basically collecting the same information. Melinda mentioned the PIRL, how many of you have heard of it other than a piece of jewelry? All right, that's pretty good. We issued a joint package data collection package called the ‑‑ in it was the data elements necessary to calculate the different performance indicators. PIRL stands for participant individual record layout. And the joint is not used for anyone to report against, the Department of Labor has its own individual record layout and RSA has, of course, your RSA 911 and adult education actually does not collect individual level data at the federal level they get aggregate reports from their states. You will knee here there are three sets of numbers and we wrote them all the same but nor bureaucratic reasons the Department of Labor has Section 677, VR has 361 and adult Ed has Section 463 but the idea is ‑‑ I have not compared but they're supposed to be identical.

These are the ‑‑ this is the outline of the information that's included in the regulations, the terms definition of terms, the six indicators.

The two other sections, one is establishing state levels of performance, the negotiations process, and we won't get into that today, but just to highlight what the statute requires there is the use of a statistical adjustment model to be used in the negotiation process of setting goals before the program year starts and then this is a new feature, using the statistical model at the end of the program year with the outcomes achieved and adjusting those goals that were set initially to reflect the outcomes achieved during the year.

So there's still a lot to be worked out. The details of that. We at the Department of Labor have used the statistical model in our negotiations, a few of the measures, we didn't use them for all of them and one of the reasons is you need data to be able to build a statistical model. Some of these primary indicators of performance we don't have any data that would make sense often to build the models, so that has played a factor in developing these statistical models.

Finally, my personal favorite, sanctions. The provision of sanctions for failure to achieve!   
(Laughter.)

Especially because they took away the provision of incentives. I, many years ago was a psychology major and the one thing I learned was, you know, reward and affect and behavior modification you want to reward people for positive behavior, and the statute didn't do that.   
(Laughter.)

Enough of that! That's my own personal opinion. There are two ways that the determination of sanctions ‑‑ two reasons for the determination of sanctions, one is looking for the performance, comparing outcomes to the levels of performance, and this will take a few years to implement, because you have to have a statistical adjustment model to negotiate the levels of performance, you need a few queers of data to build the statistical model and so on and so forth and then there are two years of ‑‑ hopefully the law will be reauthorized before we implement sanctions for failure to perform.

Now, there is another provision ‑‑ another stipulation for sanctions and that's failure to report. That, I don't think we can wiggle out of. So my advice to everybody is once you start having to report your annual report, which, for vocational rehabilitation is October 15th of 2018, make sure or leave for your successors, leave a note in the file, tape it to their computer, on the desk, make sure you get that report in on time! That's going to be important and that's where we will see that accountability. So that's the outline of the regulations, and if you read through the regulations, they may not be the most riveting, I know, but you will see in them a number of references to "guidance will be forthcoming" and we had a joke in the work group and Jim Doyle is still part of our group. We talked about a lot of times, we'll just kick that can town the road because we didn't want to make the decision.

That was part of it, but also especially in the area of performance accountability you want the ability to make tweaks or adjustments. Once you go to implement it, it may not play out as the statute envisioned or even the regulations so we did have to put some information into the regulations, but we wanted the ability to put as many in guidance as possible because we do have that ability to adjust guidance. The first guidance piece that as Melinda mentioned, we are hopeful it will be coming out ‑‑ I joked the other day I said it will be our holiday present to the system.

We hope it will be out by sometime in December. I doubt it will make it by Thanksgiving but hopefully before the holiday season in earnest in December.

Then we have other pieces of guidance that will be following on its heels talking about performance negotiations and that process and the annual report and data validation and other pieces, you know, things similar to that. That's the overview of the regulations. Now, one of the things in the regulations is a set of key terms in WIOA the first being reportable individual. As you see, it's defined in the regulation of the statute and for the purposes of Title I it's a reportable individual who has taken action that demonstrates an intent to use program services and meets certain reporting requirements, certain criteria. They've provided some identifying information, they've only used the self‑service system and they've only received informational services or activities. This term came about in the thinking of there's a number of people who start into the work force, the system, whether it be the voc rehab system, adult he had, work force, education, they don't fully engage in the system yet resources are expended. So just to get some basic information on who those reportable individuals are.

The one thing the important thing is that they are not included in performance allocations, so if they come in and they get a little bit of information and they're like, this isn't for me, then the system is not penalized by counting them as a negative because they didn't pursue services. So it's really a way to gauge how many are accessing the system in general.

>>MELINDA KAUFMAN: Likewise for VR we are defining a reportable individual as someone who has expressed interest in receiving VR services or they've been referred to VR. That means they have come to VR and filled out an application so they have expressed interest in services and that point they are considered a reportable individual. We are considering students who peeve preemployment transition services to be reportable individuals so those students receiving preemployment transition services who are not on IPEs are considered to be reportable individuals and are not included in any of the performance calculations.

>>KAREN STAHA: Moving on, once a person is a reportable individual and then when they cross the threshold of receiving services, engaging in certain sets of services then they become participants and participants are those who are included in the calculation of the performance indicators. For Title I it's if someone has received a training or individualized career service. For Title I youth they have to receive an objective assessment and establish an individual service strategy and receive ‑‑ there are 14 different program elements for youth and they received at least one of those services. For Title II adult Ed they have to have 12 contact hours, for Title III it's individual career service and Title IV?

>>MELINDA KAUFMAN: A reportable individual becomes a participant once they are determined eligible for the program, they have an IPE and they received a service from VR. So you have to receive a service from VR after being on a signed IPE before you are considered to be a participant. If you have that signed IPE and yet to receive a service you're still a reportable individual. The date that the reportable individual becomes a participant is the date often they have received that service after they've signed the IPE. For students receiving preemployment transition services, they would become a participant once they have applied to VR, they have been determined eligible, they've signed an IPE and received a service from VR and that service could be a continuation of their preemployment transition services. A student receiving preemployment transition services in order to be considered a participant has to be on a signed IPE and receiving services.

>>KAREN STAHA: All right so we've made them all ‑‑ the people all participants, they have received great services, now we have to, you know, finish them off   
(Chuckles.)

And have them exit the program! Not literally, not literally!   
(Laughter.)

We want to get credit, we want everyone to get credit for all those great services! So the term "exit" is defined, again, in the regulation and for Titles I, II and III the exit occurs when the participant has not received services for 90 days and no additional services are scheduled. Those additional services, if the person were to receive any follow‑up services, if they were to access the internet, go into a resource room, receive informational only services or activities, those will not delay this period of no services, this 90 days, so those are not factored in.

>>MELINDA KAUFMAN: For VR we are the difficult ones here in our definition of exit. It's more complicated than the other three titles, unfortunately. Someone will exit from the VR program if they achieve an employment outcome in accordance with 34CFR360156, what does that mean? They have achieved an employment outcome in accordance with their IPE and they've maintained that employment for at least 90 days. At that point they have achieved their employment outcome and they can exit the program. They can exit the program if they do not achieve an employment outcome or if they have been determined ineligible after receiving services in accord within with 34CFR36143. Participants who are on supported employment with an employment outcome but they have not yet ‑‑ they're in an integrated setting, tongue twister, but they're not in a competitive wage yet they do not exit the program. We will talk more about supported employment in a few slides. So we had quite a few questions about how people receiving preemployment transition services and supported employment were handled in the 911 so we have dedicated a few slides in this presentation to talk about this. Possibly the most uncomplicated part of preemployment transition services is that they're reportable individuals and they're not included in the performance measures if they're not on an IPE. As I mentioned earlier, once they apply for VR services they are on an IPE and they begin receiving services those services could be a continuation of their preemployment transition services then they become participants. If they exist the program without becoming a participant they're not included in any of the performance measures, we just close their case and move on. If someone applies for or is receiving preemployment transition services, they decide they want VR services they apply for them, unfortunately they're in a state that is on an order of selection and they're placed on this order of selection so they're still not a participant because they're not on an IPE. We've got several required data elements in the RSA 911 for students receiving preemployment transition services. Tonya mentioned earlier they are a unique identifier, the Social Security Number if it's available, the start date they received the preemployment transition services, date of birth, race and ethnicity and these two are required if the student is in elementary or secondary education. Student with a stability, and then we've ‑‑ student with a disability and then the five required services, okay, then the next slide I added today during the break because Tonya kept telling everybody that I was going to be talking about required documentation.   
(Laughter.)

Here is our slide talking about required documentation. So what can be used to suffice the documentation requirements for students receiving preemployment transition services, this could be a case note documenting the counselor's observations, review of school records, statement from educational staff or a referral form for a preemployment transition services with the identification of the student's disability, signed by the parent, guardian or school staff or a copy of the individualized education program document, the IEP copy of the Social Security Admission's beneficiary award letter, a school psychological assessment or documentation of a diagnoses or disability determination. So there is quite a wide array of things that can be used to satisfy this requirement. I see some people trying to take pictures of the slides. We will post these on the web site, I promise. One other thing related to preemployment transition services, Tonya and Craig or Chris or whatever we're calling our fiscal guy today   
(Laughter.)

‑‑ talked about how we have to break out services for those receiving preemployment transition services. Just wanted to put this in here to kinda give you guys a heads up as you're structuring contracts with outside vendors that we need to break out the required preemployment transition services so if somebody has received $5,000 of preemployment transition services it's not sufficient just to put $5,000 in the RSA 911. You have to break that out into the five categories, required categories in elements 97‑126. Also just to emphasize that if you are providing these in a group, in a group setting, that you need to break the costs out to the individual level. If you've provided a group session on self‑advocacy to ten students with disabilities who are receiving the preemployment transition services, that would be $50 a student and you need to break that out and record it in the 911 with the appropriate category, the self‑advocacy. I'm going to read this slide, I'm sorry. John has been receiving preemployment transition services. He would like to receive additional services from the VR program so he applied for VR services and was placed on an order of selection. John turned 25 which means he no longer meets the definition of student with a disability in his state so he doesn't live in Michigan, thus is no longer eligible for preemployment transition services. How is John's case handled in the 911? Well, once John had applied for the VR services his counselor would have updated elements 737 which are required at application. John is going to remain a reportable individual because he has not yet been placed on an IPE and the second part of that question is since he's no longer receiving preemployment transition services, how is he represented in the performance measures? Raise your hand if you think he's going to be included in the performance measures? All right. No, he's not because he's still just a reportable individual he's not eligible for inclusion in any of the performance measures. So supported employment. This is probably my favorite topic. Suzanne is laughing because we have spent countless hours together trying to figure out how top going these people, people that are receiving supported services in the 911 so we had a lot of fun and bonding time together.

So the first sentence here, I'm sure you will find this especially helpful is participants may or may not exit the VR program. I'm going to try and break that down for you.

Suzanne is going to give you more on Wednesday, I'm just going to talk about the 911 here, so CSAVR questions for Suzanne on Wednesday. So those who have been receiving support employment services and they have achieved their employment outcome will exit if they meet the definition that we talked about previously so they are in competitive integrated employment, they have not received services for 90 days and they've been stable in that job nor 90 days. At that point they will exit the program and be eligible for inclusion in the performance measures. Then we've got the opposite scenario so those that do not meet the definition of exit so somebody who has been receiving supported employment services and at the end of their 24 months they're in a job where they're not yet earning minimum wage, they're in an integrated setting but not earning a minimum wage. These people are going to continue in the supported employment or VR services on a short‑term basis. So their case record is going to remain open because they're receiving services from the VR agency so we need to make sure we're accounting for those services. So they have not exited the program, still receiving services from VR. Then we've got the case of youth who are receiving extended services from the VR agency. Their service record will also remain open because they're still receiving services and they be finally we have the case in which we're going to close the service record because somebody has exceeded the amount of time that they can receive VR services on the short‑term basis but unfortunately they were unable to reach the competitive wage, so those people will exit the VR program but they are not ‑‑ we're going to close their case. They're not considered part of the definition of exit so they will not be included in the performance calculations. They're now ineligible to receive VR services.

>>KAREN STAHA: All right.

>>MELINDA KAUFMAN: Calm down I'm still going.

>>KAREN STAHA: I got ahead of myself. I'm so excited!

>>MELINDA KAUFMAN: Once this has been achieved we're going to the 911 record, element 348 which is outcome in employment and we have two codes to choose from, code 5 they're in supported employment in competitive, integrated employment or code 6 they're in supported employment on the short‑term basis. So the difference is are they earning a competitive wage? Again, only those who we would code 5 would be eligible to exit at this point and be included in the performance measures. Now we have a scenario and we will very visit Jane several times throughout the next few slides so we can talk about how she is included in the 911 and the performance calculations but we will start, Jane applies for VR services and say found eligible. She is assigned to the most significantly disabled category and has a goal of supported employment on her IPE. She received VR services in accordance with her IPE, was placed in a job, received supported employment services for 24 months and say being paid $6 an hour at the time of her supported employment outcome so she has not achieved minimum wage. She is going to enter the short‑term basis period working toward competitive, integrated employment. During the short‑term basis period Jane continues to receive VR services. How is Jane's case handled in the RSA 911 and since she has achieved supported employment outcome how is she report in the performance measures? Well, we're going to go to the 911 and look at element 348, employment outcome and Jane is going to be assigned code 6 which is supported employment on a short‑term basis and this is because she has not achieved a competitive wage. She is going to be working on that in the short‑term basis, continuing to receive VR services. She is not going to be included in the performance measures because she has not concluded the program.

>>KAREN STAHA: Are you still with us? After all to quote the inventors of my favorite food, ice cream, Ben and Jerry says if it's not fun, why do it? I hope you're having fun!   
(Laughter.)

When I first started this job someone said to me are performance, you don't want to do that and I said no, we're going to make it fun! Okay, under WIOA and for the six core programs and under the Department of Labor there are several other programs that are using the same indicators, there are six primary indicate ors of performance. Employment in the second quarter after sit the employment rate if the fourth quarter after exit, the median earnings in the second quarter after exit, a credential attainment rate, a measurable skill games, and the effectiveness in serving employers.

The first few may seem familiar. They are variations of what different programs have used, especially if those of you who are familiar with the Title I programs, these are similar but they're different. So that's, I think, one important distinction is to not be making comparisons of outcomes under WIA or old programs and under WIOA, because they're different. Many of these were defined this the statute so we didn't have any ‑‑ a lot of flexibility with the definitions, all right, getting mood lighting now!

>> AUDIENCE MEMBER: Now it's really fun!   
(Laughter.)

>>KAREN STAHA: Yeah! They're trying to, you know, get rid of our visual over here. For instance the median earnings in the second quarter off exit in the past we have used average earnings. We got a number of comments why are you using median earnings? Well that's what the statute said. Those attorneys wouldn't let us vary it. The first four indicators are all exit based so once the person has finished program, finished services, no more services for 90 days, then with the variation under the VR program, then you start calculating performance. The measurable skill gains, that's a brand new measure. It's similar to something that the adult education program has had. In its concept it's a progress, an interim progress measure and we will talk about it in a little bit, the details of it. So that's a progress, you will be reporting on that as you have participants. Each year your participants, you will report them on that. Finally the effectiveness in serving employers. Now, Congress defined most of the other measures, but they said, oh, Department of Labor and Education you figure out that definition! We know we want this indicator, we recognize that the employer is an important customer of the system, which the employer is critical, because you can train people all day long but in the end it's important to help them get jobs and so you need that employer customer, yet ‑‑ so we mulled over how we were going to define this and put out a proposal in the notice of proposed rulemaking and unlike just now there was no light that went on! It was a great timing! We did not get a perfect answer! So as you'll hear, we're going to do a pilot on this indicator. The options for the effectiveness in serving employers one is exit based and the other two are based on other calculations. Are you doing this?

>>MELINDA KAUFMAN: Sure.

>>KAREN STAHA: I couldn't remember.

>>MELINDA KAUFMAN: So on what basis is someone excluded from the performance measures? We're going to look at 355, reason for exit. Those excluded are no longer available for services due to residence in an institution so that would be codes 1 or 7. I think 7 is a correctional institution and 1 is all other institutions. Health or medical so they're incapacitated with a medical condition, code 2, they've died, code 3, they've been called to active duty, code 4, or they are ineligible and there's a whole host of reasons that we'll talk about later that someone could be ineligible and those will be 6, 8, 9, 10, 11, 12 or 15.

>>KAREN STAHA: And one reason for exit which is no longer valid and especially those who may have worked with Title I programs in the past, in the past under WIA we had an exclusion if you did not have a Social Security Number. That is no longer a reason for excluding a participant. Now, if they ‑‑ having a Social Security Number is not a criterion for receiving services. A person does not have to provide a Social Security Number. If they do not then we have provisions for collecting supplemental wage information to verify their outcomes but that is an important consideration just for people to realize that that exclusion no longer exists.

Moving on to the different performance indicators, the first one is the employment in the second quarter after exit, it's a percentage of participants who are in unsubsidized employment during the second quarter off exit from the program.

Again, previously we had a similar measure under WIA, it was for those who were unemployed at date of program participation. This measure now includes everyone so if they come to your door and they're unemployed, employed, underemployed, you would still count them in the indicator. The outcomes will be verified using UI wage records or other administrative records or supplemental wage information. And you would divide ‑‑ to calculate the employment rate you take the inform participants in the reporting period who were employed and divide them by ‑‑ in the second quarter, excuse me, in the second quarter divided by the number of participants who exited during the reporting period.

>>MELINDA KAUFMAN: If we look at that for VR and the 911 the numerator would be RSA 911 Element 383 participants who are employed in active integrated employment after program exit and the denominator we're going back to Element 355 and we're going to look at the codes we didn't previously exclude, so those would be 13, transferred to another agency, 14, they have achieved competitive, integrated employment, 16, they needed extended services that were not available from VR, 17 they're unable to locate, 18, they're no longer interested in receiving VR services or 19, "other."

So let's take a minute and revisit Jane from our supported employment examples. Jane during the short‑term basis begins earning $7.25 an hour so federal minimum wage. Jane then stops receiving services from the VR agency and her service record is closed. She now meets the definition of exit. How will Jane's service record be handled in the 911 and will Jane be included in the employment rate second quarter after exit measure. Who thinks Jane is going to be included in the employment rate? Raise your hand high, be proud! Right, Jane is going to be included in the denominator because she exited in competitive, integrated employment. Jane will be included in the numerator if she is still employed during the second quarter after exit. If not she will be a negative outcome for the agency. In the 911 and, again this is all in the notes so you don't need to write down specific elements that I'm talking about now, Element 353 date of exit, fill in the date she exited, 354 is the type of exit and, again, code 6, the individual exited after an IPE in competitive and integrated employment or supported employment. Almost 355 reason for exit will be code 14, achieved competitive, integrated employment and 356, employment outcome and exit, she will be assigned code 5, supported employment in competitive integrated employment. Now let's look at Jane and assume this time she did not achieve the competitive wage at the end of her short‑term basis period and she is only receiving $7 an hour which is less than the federal minimum wage. She is no longer receiving supported employment or VR services because she is exceeded the amount of time she can receive them through the short‑term basis period. How is Jane's case handled in the 9 Len and since she achieved supported outcome in the minimum wage how is she represented in the performance measures? Who thinks Jane is going to be included in the employment performance measure? Okay, actually she is not! We will talk about why in a minute. Let's go back to the 911 and repeat the exercise we just did. 353, Almost 353, date of exit, when she has finished services. Almost 354 type of exit, this time she will be coded 5 individual exited an IPE and non integrated or noncompetitive employment. 355, reason for exit you will code her 6, ineligible, she is no longer eligible to receive VR services. And you will not code element 356 employment outcome at exit. While she had an employment outcome at the time of her employment she did not have one at exit so we will leave that blank and since she exited the program as ineligible she will not be included in the performance measures.

Then we've got one more scenario to talk about here. We've got a small agency that has worked with a number of participants who receive services from the VR program and exited during the first quarter of the program year. We will assume that those people who have received VR services were on an IPE and their employment is assigned with their IPE, that's a lot to put on a chart. We've got person No. 1, Abdul, he received employment services he's employed in the second quarter, employed in competitive, integrative employment. Brandy is not employed because she is no longer interested in receiving services. Candice is in integrated employment. Danielle received VR services and is employed in integrated employment, Elmer is not employed and currently resides in a correctional institution, Grace received preemployment transition services and is no longer eligible to receive them, and Hiratio received employment services and is employed in competitive, integrated employment so we have to look at our seven candidates and determine who is eligible to be included in the denominator of our performance measure so that would be anybody who has received VR services and exited in one of our eligible categories. So Abdul, brandy, Danielle and Hiratio, Elmer is not eligible for including and Candice and Grace received preemployment transition services so they are only reportable individuals and not included in the performance measures. Now to calculate the numerator we look at those four and determine who is in competitive, integrate employment and the only one that's not is Brandy so our employment rate would be 75% because three of four are employed in competitive integrated employment.

>> AUDIENCE MEMBER: (Away from mic.)

>>MELINDA KAUFMAN: You can ask it now. I don't know that I have an answer.

>> AUDIENCE MEMBER: Looking at your seven scenarios, I'm looking at one that isn't there. Say James is employed, he's making $9 an hour in terms of the second quarter reporting, okay? He's making $9 an hour but he's not employed in a competitive integrated setting.

>> AUDIENCE MEMBER: (Away from mic.)

>> AUDIENCE MEMBER: Competitive nonintegrated environment.

>>MELINDA KAUFMAN: He's in a sheltered workshop or something like that?

>> AUDIENCE MEMBER: I'm sorry?

>>MELINDA KAUFMAN: A sheltered workshop?

>> AUDIENCE MEMBER: Ability 1 program.

>>MELINDA KAUFMAN: He is not included in the performance measures. Those who are not seeking VR services are not eligible and also if you looked at Element 355, code 15 was one that is not eligible for inclusion, because they're in a sheltered or nonintegrated setting ‑‑

>> AUDIENCE MEMBER: Let me clarify he or she received VR services with the expectation of going to work in a competitive integrated employment setting but in the end chose to work in an ability 1 program where they're making $12 an hour but it's in a noncompetitive, integrated employment. Did I say that right? Whatever! You know what I'm talking about.

>>MELINDA KAUFMAN: Right and we're considering those ineligible outcome 15 and Element 355 so they're not included in the measures. Right, Carol?

>> AUDIENCE MEMBER: (Away from mic.)

>>MELINDA KAUFMAN: Right. Right because he doesn't meet the definition of employment outcome. So he's exiting as an ineligible ‑‑

>> AUDIENCE MEMBER: (Away from mic.)

>>MELINDA KAUFMAN: So he's not meeting the definition of employment outcome and is exiting as ineligible.

>>KAREN STAHA: Okay the next indicator of performance is the ‑‑ oops, sorry. The employment in the fourth quarter after exit, this is very similar to the employment in the second quarter just a different point of measurement, a different data point. I will tell you when we first read the statute, we interpreted this as a retention measure. Thinking oh if they're in the ‑‑ employed in the second quarter and looking again in the fourth quarter. It is not a retention measure. We look at different people. It's just taking a snapshot of who is employed in the second quarter, and who is employed in the fourth quarter.

>>MELINDA KAUFMAN: For VR purposes we will look at Element 389 the fourth quarter after exit, those in the fourth quarter after exit remaining employed. Codes 13, 14, 16, 17, 18 and 19.

>>KAREN STAHA: The median earnings in the second quarter after exit, first looking at this, median and I have to go back to my high school math to remember, you know, the mean, the median and the mode. The median is the middle number so we have examples here. 1, 3, 6, 7, 8, the median is 6. If there are an even number then you split the two so, again, there's 1, 3, 6, 7, 8 and 47, the median is 6.5. It is not ‑‑ sometimes it's similar but it is not the same as the mean, which is the average because if you look at the same data set the mean would be 12. The advantage of the median is that it gets rid of the outliars, yes, it gets rid of the outliars so you look at your middle point. So you take all the outcomes, the earnings and you look at where is the middle point and that would be your median. So the median is just looking at your earnings in the second quarter after exit. There are certain exclusions and these are for RSA it's the ‑‑ if they're not employed in the second quarter and there is your data element for RSA 911 if the wage information is not yet available, and this would be, I would say, a temporary exclusion because eventually if you don't have the wage information then it's negative outcome. If there is zero income or if they're in subsidized employment.

How are the median earnings calculated and we just sort of went through that, you rank 'em, look for the middle wage. All right, here is a chart on the UI wage verification timeline. I will just say that some of you may be familiar, the Department of Labor has, for several years, overseen a system, the wage record interchange system, the RIS and that's for states to obtain wage records, wage information from other states. Each state ‑‑ and I will say all UI wage records, one important consideration is they are state wage ‑‑ the state owns it. It's the state UI information. We have operated, over seen the RIS which allows for the exchange of wage information for performance purposes with other states all in accordance with ‑‑ according to state UI law. So if the state UI law wouldn't allow for the exchange it did not happen. We are looking ‑‑ we are working to revise that system, that interchange system to incorporate that all core programs including vocational rehabilitation and adult education would have access to the interstate wage information from other states so one state would have information from the other.

We're working on the data sharing agreement. It's going through iterations, we are working with the ‑‑ on the education side, we're working with the colleagues who over see FERPA the federal educational records privacy act to ensure that all confidentiality requirements and provisions are met. Hopefully this will provide one access. Again, this is interstate. You will still need to work within your state with your state colleagues who oversee the UI wage record information to obtain that information. And here is a chart that shows the different quarter and when you would get the information and there is a two quarter lag. The definitions of the indicators are a little further out, the second quarter and the fourth quarter, then there is a two‑quarter lag so we really are getting delayed, you know, delayed information on outcomes. They won't be necessarily very timely information that you report. So that will be ‑‑ but this shows you when you would ‑‑ this chart can show you when you would get the data, for instance, in quarter three, the end date would be June 30th, 2018 and the status employer is reporting the quarter two data to UI and quarter four, September 30th, UI reporting the Q2 data to the VR agency.

So that's ‑‑ and we will continue to provide information as the revised data sharing agreement becomes ‑‑ next step is once we get an agreement among the state agencies and the departments then we will send it out for review. It will likely be a year before it is operational which is fine because, because of the data lags and the definitions, for instance next October, October 2017 the Titles I and III programs and Title II will be reporting information to the respective departments but the only information that they will report is participant counts and any people who achieved a measurable skill gain because all the other indicators are exit based and there won't be enough time for them to have exited and to verify their outcomes.

>>MELINDA KAUFMAN: I should have picked a different name for this one.

>>KAREN STAHA: No, I like it!

>>MELINDA KAUFMAN: Karen was placed on an IPE in May of 2016 with an employment outcome goal of homemaker. This was before ‑‑

>>KAREN STAHA: I wish I was!

>>MELINDA KAUFMAN: So this was before the outcome was allowable, Karen receives her goal in July of 2017 and exits the program with an uncompensated outcome so in RSA 911 data Element 356 employment outcome at exit she would be given code 7, uncompensated worker. How is Karen's exit reflected in the employment and wage measure? So she is going to be excluded from the wage measure as Karen mentioned the additional exclusions for the median earnings measure if you have a zero dollar wage you are excluded from this measure. Despite being not being in competitive, integrated employment she will be counted in the employment measures and this is because she was placed on her IPE with the homemaker goal prior to the effective date of the VR regulations. So she still meets the definition of exit so she had a grandfather ‑‑ she was grandfathered in because her IPE was established with this goal prior to the regulations so included as a positive outcome in the employment measures not included in the wage measure.

>>KAREN STAHA: The next one is credential attainment rate. This is ‑‑ has two parts and one, you know, just to ‑‑ is an overview what is a credential. Secondary school diploma or equivalent. A postsecondary credential, an industry‑recognized certificate or certification, apprenticeship, state, federal recognized licensure and an associate, Baccalaureate or post‑graduate degree. You will see from looking at these examples that these are all ‑‑ there is a certain amount of rigor, it's issued by a state certification, certifying entity or federal and there is some standard to qualify to be considered a credential.

There are two types, there is the secondary school ‑‑ sed dear credential and a postsecondary credential. A recognized postsecondary credential is awarded in recognition of an individual's attainment of measurable skill, measurable, technical or industry occupational skills necessary for employment or advancement within an industry or occupation. What is not a credential is activities such as work readiness certificates, work force development board certificates, health safety certificates, these are all important but they're not ‑‑ they don't meet that level of industry recognized or certified by a state licensing entity. We found early on in WIA that some people were counting when people got a library card, as the certificate   
(Laughter.)

We thought, well that's important but, you know, it's not really ‑‑ it's, you know, I guess you could extrapolate that, okay, if you have a library card you're reading and you could advance your ‑‑ you know, but, no! So we're looking at, you know, these are important certificates, however, they're not considered a credential. These will be, you know, different pieces that will lead to that credential.

Because, um ‑‑ you know, especially I will mention the health safety certificates, I don't want to become crosswise with my colleagues in the Department of Labor office of safety and health administration because their OSHA certificates are important but not in the same category. What Congress was looking for or what we ‑‑ you know, the emphasis is that to have a credential that leads to or training ‑‑ you know, a certain level of training or education that will really help achieve that employment goal. So the credential indicator is the percentage of those participants enrolled in an education or training program excluding those in OJT and customized training and I will explain that in a minute. So if you're in an education or training program and you attain a recognized postsecondary credential, or if you attain a secondary school diploma or its equivalent and you then move on to ‑‑ you either become employed or you are enrolled in a program leading to a postsecondary credential. The credential attainment has to occur during participation or within one year after exit and that was that data element that Melinda mentioned earlier so you need that date, because it has to occur within one year.

Now, who is included is participants who exit or complete postsecondary programs and as I said, if you're in secondary ‑‑ if the person is in secondary education, they can be counted if they complete the secondary diploma but you have to then be employed or enrolled in a program leading to a postsecondary credential with one year after exit. You don't have to have complete that postsecondary credential within that one year just be enrolled for the secondary diploma to count. This was all by and large specified in the statute. The emphasis is definitely on the attainment of postsecondary school credentials. With the thought that that helps move you toward that goal of employment. The two exclusions from this indicator are those in on‑the‑job training or customized training and, again, these are important service interventions, and we emphasize the importance of and having participants participate in these types of trainings but these don't in and of itself themselves necessarily lead to a credential, and on‑the‑job training can be very positive and over the years I have seen the most positive outcomes in earnings were those who participated in on‑the‑job training. However, it doesn't necessarily lead to a credential we don't want people to be penalized for putting people into an OJT or customized training so that exclusion has been included in the regulations. Also, the other group of participants that are ‑‑ who are excluded are those in Title III employment service because the employment service does not provide training services so that would exclude them. They are not in the credential attainment indicator or the next one, measurable skill gains.

First, VR

>>MELINDA KAUFMAN: We're going to translate. Karen said for VR and the 911 so for VR we're going to include all participants who have participated in an educational or training program leading to a postsecondary credential or those that are enrolled in secondary education with a diploma or equivalent on their IPE.

Again, we will exclude participants receiving only OJT or customized training. This was related to the 911, this was a difficult one to map out because we don't have a direct one‑to‑one match with the PIRL because we're breaking out all of our degrees and services based on who is paying for them so is VR paying for it or how is it being provided or paid for? So on this slide we've got the list of those included and the numerator again with elements 81 and 82 those are the secondary school diploma or equivalent to be included in the numerator they have to be enrolled in a postsecondary education program or employed in competitive integrated employment within a year of exit.

For the denominator, we've got them broken out on this list, I won't read them to you.

We have a scenario where Kevin is a participant in the VR program. He has been work to go complete his GED which he does in July of 2017 and exits the VR program. Kevin then enrolls in a local community college where he plans to get his associate's degree in culinary arts. Is he included in the credential attainment indicator? Yes, he is. Because he has received his secondary school credential and is enrolled in a postsecondary program that will lead to a credential.

>>KAREN STAHA: All right. Those were the exit‑based indicators. Next we have the new one, the measurable skill gains which is the percentage of participants enrolled in a program that leads to a measurable skill gain during the program year. It measures progress of participants enrolled in educational or training services and, again this is designed to assess the interim progress in our career pathways program or long‑term training program. The idea is to, in fact, emphasize ‑‑ and I know that I have learned that vocational rehabilitation you often serve participants for several years so this is a good indicator to capture that interim progress that you've achieved with these individuals. It also emphasizes the importance of longer‑term training and to capture these interim progress. There are five types of measurable skill gains, you have ‑‑ it's participant based, you get one gain per person per participation period. Now, the participation period is if someone were to enroll, receive services, exit, not have 90 days of service, then within the same program year come back and enroll and do that same thing. In all likelihood that would only apply ‑‑ there would be different periods of participation within one program year if the service intervention was short‑term in nature.

Again, we're talking about a program year from July 1st to June 30th so the five types of gains are educational functioning level increase, a secondary school diploma attainment, so in and of itself you could count if the secondary school diploma attainment is on a progression on the career pathway that could count here as a measurable skill gain. A transcript or a report card showing 12 credits attained so within a year someone has been enrolled in postsecondary school and has attained 12 credit hours, showed satisfactory progress toward an established milestone and successful passage of a required exam. These are meant to be certain ‑‑ have a certain level of rigor, again, meaningful progress toward the ultimate goal. The initial ‑‑ going back, the initial ‑‑ the educational functioning level is usually measured ‑‑ is assessed by using a pretest and a post test. There is the national reporting system which has certain allowable tests and exams that can be used to assess this.

This is our colleagues in adult Ed this is a main component of what they do. The second is the attainment of a secondary school diploma and it can include an alternative diploma. Third is the secondary or postsecondary transcript or report card, showing that there's at least twelve hours per semester or for part‑time students a total of twelve hours over the course of two consecutive semesters during the program year. So, you know, again, that level of achievement that is standard and this is credit hours awarded through a state units academic standard so whatever the state unit of academic standards is, that would be the measurement of the ‑‑ the unit of measurement.

The satisfactory or better progress report toward established milestones. This could be the completion of an OJT if it's a long‑term OJT or completion of one year of an apprenticeship program and earlier this morning there was something mentioned about apprenticeship would not be considered preemployment and here you could get credit, though, if you're in a long term apprenticeship program and you have completed one year this is where it would count as a measurable skill gain. And then finally, successful passage of an exam. If there is a rigorous exam for achieving occupational skills or technical skills, could be part of an exam of a registered apprenticeship program or employer‑required knowledge‑based exam and we will provide additional information as we ‑‑ as that unfolds. This is one of these things where we've got the basics and you know there is any number of examples that we probably have not thought of so, you know, our guidance on this may be modified over time.

>>MELINDA KAUFMAN: We're in the home stretch guys, I see some people starting to fade on us, two hours is a lot. Who is included in the indicator, VR participants with education or training program that leads to a recognized credential on their IPE. So that would be the denominator of our calculation. Then the numerator would be those participants who had achieved the measurable skill gain and any of the five allowable categories that Karen just described. If we're looking at this in terms of the 911, the numerator would be elements 343‑347 with the respective category, allowable categories and only one skill gain per person so if they've multiple skill gains only one will count, you should record them all but we will only count one and then the denominator would be Element 85 those enrolled in an educational or training program leading to a credential.

Then in this scenario, we've got Sally who in accordance with her IPE has graduated college with a bachelor's degree in mathematics. She completed an internship with a local company and has received a job offer making $25 an hour for forty hours a week. Sally then exits the VR program. In which performance indicators will Sally be included? She will actually be included if all of them. Sally is our ideal participate pant.   
(Applause.)

So assuming that Sally is employed in her second quarter off exit she will count positively there as well as the fourth quarter if she is still employed. If she remains employed in the second quarter her earnings, $25 appear hour, forty hours a week, we will have to figure that out for a quarter value which works out to $13,000 a quarter. She will get the credential indicator because she has received her bachelor's degree and she also would get the measurable skill gain for completing a year of college.

>>KAREN STAHA: Go Sally!

>>MELINDA KAUFMAN: Our favorite indicator.

>>KAREN STAHA: All right, give another cheer we're on the last one!   
(Applause.)

All right as I said, we didn't come up with a ‑‑ we didn't get a silver bullet we didn't get that great definition of this indicator, so we went with an options base approach and we are going to see the data that come in and then assess ‑‑ do an evaluation, quickie valuation and come up with one definition for the indicator. I think the regulation ‑‑ the preamble, I believe, says by program year 2019, don't quote me on this. We may have to slip that, though. There is just not ‑‑ considering we're in program year 16 and to get data in and evaluated and make a definition I think we might have to revise the regulation, I'm not sure. But, anyway. We're going to work on this because, again, as I said, this is an important ‑‑ it is important to know how we're serving our employer customer. That's critical. The catches and the ‑‑ you know, early on someone says just do an employer survey. Well, in one of our town hall discussions with business people they resoundingly said don't do a survey. So we have three options. One is ‑‑ and here is where we get our retention, because one of the things the employers did tell us is they value retention of employees. They don't have to be bothered with hiring and retraining, training and bringing people up to speed. They like keeping people. So one way is to have retention with the same employer in the second and fourth quarter. Now, if you have access to wage records there is a code, I believe, on the wage record that shows they're with the same employer. If you don't have access, it's a little more ‑‑ there's a little more manual follow‑up but. . . Then the other two options, these are based on calculations using quarterly census of employment and wage information and that is the employer penetration rate. In a local area there is a number through that Bureau of Labor statistics program. We find out how many employers are in a local area and you would figure out the number of employers that you have ‑‑ the local area has come in contact with, and as a percentage, that he is the employer penetration rate. Then repeat business customer rate is looking at their list of business services that are valued and that are included. Let me see if I can find them to give you an example. The down side of using the repeat businesses, if you have a small employer and you give them a great employee they don't have a need to come back and see you for a couple years. We thought of that! So this would be over a three‑year period, how many times they come back. So that ‑‑ then, makes it challenging to be able to come up with a final definition by program year 2019 if you use this indicator, because you don't have three years worth of data. You didn't hear that from me!   
(Chuckles.)

My name is Sally!   
(Laughter.)

Any, that's ‑‑ and this measure, one thing I will say is that this indicator is to be a shared indicator, across the core programs. Because we don't want Title IV people competing with Title II, Title I, Title III, we don't want competition with this valuable pot of employers. We want you to work together to get the employer the most skilled worker for his or her job. So this will be a shared indicator. The state ‑‑ at the state level the programs will have to come together and somedayed who, you know, who is responsible for reporting it, but the results will be the same, and we have to figure out the little details of how we negotiate this. It will be negotiated across all programs but we're a few years away from that because we have to have a statistical model to negotiate it, and before that we have to have data to build the statistical model on so it's a few years down the road.

>>MELINDA KAUFMAN: And our last slide, we made it! I just wanted to give you a head's up on training that we will be providing. We have the RSA 911 changes resulting from WIOA and then a couple of performance accountability things on the horizon, once the guidance is released, we will do a webinar so you have a chance to digest it, maybe get more out of it than you did today and we have a joint webinar on December 15th as part of the WIOA Wednesday series and I wanted to put this on your radar, occupational requirements survey, anybody heard of this? This is something I think will be vital to VR counselors in the future. We're going to get the Bureau of Labor statistics to do a webinar for us. Basically they've been contracted by the social security administration to help them overhaul the data that they use for their disability determination program which many of you know there is a five‑step process for this so this data is going to help them answer the questions can you do the work you did previously and can you do any other work so they're looking at occupations in the economy and assessing the skills that you need, do you need to be able to type? Lift? Do you need decision‑making capacity? So that could be interesting and useful data for you all, it's supposed to be published December 1st.

>>BETSY HOPKINS: Thanks, Melinda and Karen for navigating us through challenging information.   
(Applause.)

We do have about 10 minutes people can step up to the mic.

>>KAREN STAHA: While you're coming to the mic I have a question. We had two joint webinars already, one in October and one last week. Were any of you accessing them? Okay, good. We will as Melinda mentioned we have a few more scheduled. We can schedule more. They're not ‑‑ I know they're not the best way to deliver the information. We're toying with different options and venues, methodologies of delivering the information so as you have ideas of how to get this information, please let your state liaisons know or this organization, CSAVR to help better inform us because we value your time, it takes us time so we want to make sure it's beneficial for you.

>>BETSY HOPKINS: Thanks.

>> AUDIENCE MEMBER: Thanks a lot I appreciate that. I know that there's a lot of question about the documentation of for potentially eligible folks. Hypothetically in New Hampshire I just know of a state that happened to put the bulk of its 15% into that potentially eligible category. We want to serve as many folks as possible in that way. What we had been getting is a great deal of push‑back regarding the data elements being collected. So what I think I heard today and I want to make sure I'm clear on this, is that now there are only two things that you're requiring for participation and that's race and ethnicity those are the only two that are required?

>>MELINDA KAUFMAN: No can you put the slide back up, Jim?

>> AUDIENCE MEMBER: It was confusing when we went through that because we have had schools tell us hey, look, if the parents and the student don't want to give you this data we can't help you either because we have a law that prohibits that information being provided.

>>MELINDA KAUFMAN: So Jim is working on putting the elements up that are required. These are required for preemployment transition services.

>> AUDIENCE MEMBER: Required if student is in elementary or secondary, required ‑‑

>>MELINDA KAUFMAN: So the reason ‑‑

>> AUDIENCE MEMBER: So you're talking about the younger ‑‑

>>MELINDA KAUFMAN: In general if somebody doesn't self‑identify you leave it blank or put the code in that said they didn't identify with the secondary, elementary and secondary students you have to then if they don't self‑identify you have to identify for them.

>> AUDIENCE MEMBER: Okay. That's interesting. So another thing that we heard earlier today and I think I'm still confused about this is that when someone is referred to participate as a potentially eligible we are requiring that we receive some documentation of their disability? Because if they're potentially eligible, I mean, they haven't been determined eligible for VR much less anything else so we have people that come to us frequently that don't necessarily have documentation and in part of the assessment we get that.

>>MELINDA KAUFMAN: But if you're providing them with services we need to track them in the 911.

>> AUDIENCE MEMBER: Sure I understand that. That comes to the other question if they're unwilling to provide data are they denied services?

>>MELINDA KAUFMAN: Did you want to answer that one?

>> AUDIENCE MEMBER: These are real issues that we're dealing with in New Hampshire and I'm sure others are as well so I am trying to figure out how we navigate this.

>>BETSY HOPKINS: Did you want to come back with an answer later?

>> AUDIENCE MEMBER: That's fine. I appreciate it.

>>BETSY HOPKINS: That's good.

>> AUDIENCE MEMBER: Sorry, I won't Monday positively lies the whole thing, talking about credential attainment, we heard information earlier that the services provided via project search would be counted toward PEOTS, can we count that as a credential attainment?

>>MELINDA KAUFMAN: No.

>>KAREN STAHA: No.

>>MELINDA KAUFMAN: Did you want to elaborate?

>>BETSY HOPKINS: Tonya is going to answer that' mic.

>>TONYA STELLER: We talked about what an educational program means for the purpose of the definition of a be student with a disability so with the description of a student with a disability an educational program would have to be one that offers a recognized educational credential like secondary education, postsecondary education ask just like the slide that went up, completion of a work readiness training isn't a credential so that's why project search is a great program and yes the department recognizes it but it's not an educational program where someone is getting a secondary or postsecondary education credential.

>> AUDIENCE MEMBER: Fair enough.

>> AUDIENCE MEMBER: Stay right there!   
(Laughter.)

>> AUDIENCE MEMBER: I've been told no transportation.

>>TONYA STELLER: No transportation can be paid for with reserved funds!   
(Laughter.)

>> AUDIENCE MEMBER: I love you, too!   
(Laughter.)

Measurable skill gain it's a simple question. Has to pass an exam. Driver's license? Yes or no?

>>MELINDA KAUFMAN: No.

>>KAREN STAHA: No.   
(Laughter.)

(Applause.)

>>KAREN STAHA: If it were a commercial driver's license.   
(Applause.)

>>KAREN STAHA: If it were for a truck driver.

>> AUDIENCE MEMBER: No, no, no!

>> AUDIENCE MEMBER: (Away from mic.)

>>KAREN STAHA: A driver's license in and of itself, no. To drive a private vehicle, just for you to ‑‑

>> AUDIENCE MEMBER: Gotta get to work back and forth.

>> AUDIENCE MEMBER: How you doing?

>>BETSY HOPKINS: I think we have time for one more question.

>> AUDIENCE MEMBER: This may be for Tonya, thanks for giving us this information. I'm learning about transition learning schools, such as I know in Tennessee Vanderbilt has one Clemson University has one particularly for students with intellectual disabilities, would that, graduating from the college experience so to speak would that be considered under the TLS a credentialed program?

>>TONYA STELLER: As I said this morning, it wouldn't be a recognized credential ‑‑

>> AUDIENCE MEMBER: The reason I asked is that tuition to go to that type of program ‑‑ what is the new phrase everybody we're using PRETS? Okay. Is considered one of those things?

>>TONYA STELLER: I'm not allowed to use the acronym but, no, when I talked this morning we talked about "think college" and that wouldn't be a recognized credential for education although, again, it is a very needed program so if students are going to think college and they get a certificate of completion in that it's not considered to be a credential but VR could still be providing those services again under an IPE.

>> AUDIENCE MEMBER: And we do, since we were talking about the credential, but thank you.

>>TONYA STELLER: But you might be able to report it as a measurable skills gain? Somebody was saying from the audience, I don't know ‑‑

>>KAREN STAHA: The number of credit hours I'm not familiar with the program so ‑‑

>> AUDIENCE MEMBER: Okay. Thank you. Thanks a lot.

>>BETSY HOPKINS: I think we're going to wrap it up, here, thank you so much everyone and right now, thank you Karen and Melinda.   
(Applause.)

>>BETSY HOPKINS: We have a break for 15 minutes and then welcome back.

(Coffee break.)