



# Montana Department of LABOR & INDUSTRY

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2 **Division: Workforce Services Division**  
3 **Category: WIOA**  
4 **Effective Date: TBD**  
5 **Last Revised: N/A**  
6 **Policy No.: TBD**

## 7 WIOA Wage and Supplemental Data Sources Policy

8 **Background:** This policy will describe wage sources, supplemental data sources and methods to collect data  
9 for performance.

10 **Scope:** This policy applies to all service providers operating WIOA Title I programs, WIOA Title I program  
11 managers, WIOA fiscal officers and the WIOA monitoring team. This policy is effective (*insert date upon SWIB*  
12 *approval.*)

### 13 **Policy:**

#### 14 **Primary Indicators of Performance:**

- 15 • The following five indicators of performance applies to the Adult, Dislocated Worker and Youth  
16 programs:
  - 17 ○ Employment Rate – 2<sup>nd</sup> quarter after exit
    - 18 ▪ Youth – In education or employment in 2<sup>nd</sup> quarter after exit
  - 19 ○ Employment Rate – 4<sup>th</sup> quarter after exit
    - 20 ▪ Youth – In education or employment in 4<sup>th</sup> quarter after exit
  - 21 ○ Median Earnings – 2<sup>nd</sup> quarter after exit
  - 22 ○ Credential Attainment
  - 23 ○ Measurable Skill Gain
- 24 • Data sources that may be used to attain the five indicators of performance are:
  - 25 ○ Wage records and supplemental information is used to attain the Employment Rate for the 2<sup>nd</sup>  
26 and 4<sup>th</sup> quarter after exit and the Median Earnings 2<sup>nd</sup> quarter after exit.
  - 27 ○ School records may be used to document Credential Attainment.
  - 28 ○ School records, Assessments and Business Records may be used to document Measurable Skill  
29 Gain.

#### 30 **Wage Records:**

- 31 • To ensure comparability of performance on a national level, wage records are the primary data source  
32 for the employment-related measures.
- 33 • Unemployment Insurance (UI) wage records:
  - 34 ○ To the extent it is consistent with state law, UI wage records will be the primary data source for  
35 tracking the Employment Rate and Median Earnings. UI wage records include private sector,  
36 non-profit sector, and government employer wage reports.
- 37 • Additional Wage Records:
  - 38 ○ While most forms of employment in a state's workforce are covered and will be in the UI wage  
39 records, certain types of businesses and employees are excluded by Federal UI law or are not

1 covered under states' UI laws. States may use record sharing and/or automated record  
2 matching with other employment and administrative data sources to determine and document  
3 employment and earnings for non-covered workers.

- 4 ○ Additional wage record data sources include the following:
  - 5 ■ Wage Record Interchange System (WRIS)
  - 6 ■ U.S. Office of Personnel Management (OPM)
  - 7 ■ U.S. Postal Service
  - 8 ■ Federal Employment Data Exchange System (FEDES)

### 9 Supplemental Sources of Data:

- 10 ● Supplemental data will be used for program management purposes and to gain a full understanding of  
11 program performance and activities. Although most employment situations will be covered by wage  
12 records, certain other types of employment, particularly self-employment, are either excluded from the  
13 sources of data identified above or very difficult for grantees to access due to data confidentiality.
- 14 ● Grantees should not be discouraged from providing entrepreneurial training or assisting the hard-to-  
15 serve simply because the subsequent employment is not covered by wage records. Therefore, to convey  
16 full and accurate information on the employment impact of ETA programs, grantees may use  
17 supplemental sources of data to document a client's entry and retention in employment for those  
18 clients not covered by wage records.
- 19 ● Allowable sources of supplemental information for tracking employment-related outcomes include case  
20 management notes, automated database systems, One-Stop operating systems' administrative records,  
21 surveys of clients, and contacts with businesses. All supplemental data and methods must be  
22 documented and are subject to audit.
- 23 ● Supplemental data must be entered in the MWorks WIOA Follow-Up screen to ensure it will be used  
24 when calculating performance.

### 25 Administrative Records:

- 26 ● Administrative records will be the data source for the education and training portion of the placement in  
27 employment or education measure and the credential attainment measure. All data and methods used  
28 to determine placement in education and training or credential attainment must be documented and  
29 are subject to audit.
- 30 ● Placement in post-secondary education or advanced training/occupational skills training:
  - 31 ○ The following data sources can be used to determine whether clients in youth programs are  
32 placed in post-secondary education and/or advanced training/occupational skills:
    - 33 ■ Case management notes and surveys of clients to determine if the individual has been  
34 placed in post-secondary education and/or advanced training/occupational skills  
35 training; or
    - 36 ■ Record-sharing agreements and/or automated record matching with administrative or  
37 other data sources to determine and document that the client has been placed in post-  
38 secondary education and/or advanced training/occupational skills training. These data  
39 sources may include:
      - 40 ● State boards governing community colleges
      - 41 ● State boards governing universities
      - 42 ● State education associations
      - 43 ● Integrated post-secondary or higher education reporting units
      - 44 ● Training institutions/providers
- 45 ● Degree or Credential:
  - 46 ○ The following data sources can be used to determine whether clients have attained degrees or  
47 credentials:

- 1                   ▪ Document in case management notes that the individual has received a degree or  
2                   credential. For data validation purposes, required documentation in the client file  
3                   includes the following sources:  
4                   • Transcripts  
5                   • Credentials  
6                   • Diploma  
7                   • Letter from school system  
8                   ▪ The date on the degree or certificate must match what is entered in MWorks.  
9           ○ Record-sharing agreements and/or automated record matching with administrative or other  
10           data sources to determine and document that the client has received a degree or credential.

11 **Monitoring and Evaluation:**

- 12           • A formal monitoring will be conducted on an annual basis by the entity designated by SWIB.

13 **References:**

- 14           • [Family Educational Rights and Privacy Act \(FERPA\)](#)