



Montana Department of LABOR & INDUSTRY

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2 Division: Workforce Services Division
3 Category: WIOA
4 Effective Date: 10/1/2018
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6 Policy No.: 28-18

7 Workforce Innovation and Opportunity Act Wage and 8 Supplemental Data Sources Policy 9

10 **Background:** The Workforce Innovation and Opportunity Act (WIOA) establishes performance
11 accountability indicators and performance reporting requirements to assess Montana’s effectiveness in
12 achieving positive outcomes for individuals served by each of the WIOA core programs. This policy clarifies the
13 use of supplemental wage information when that specific information is necessary for verifying and reporting on
14 employment-related performance indicators.

15 **Scope:** This policy applies to all service providers operating WIOA Title I Adult, Youth, Dislocated Worker, and
16 National Dislocated Worker Grants (DWG); Jobs for Veterans State Grant (JVSG), and the Employment Service
17 program authorized under the Wagner-Peyser Act, as amended by Title III; WIOA Title I Adult, Youth, Dislocated
18 Worker, DWG, JVSG, and Title III Employment Service program managers; WIOA fiscal officers; and the WIOA
19 monitoring team. This policy is effective April 1, 2022.

20 21 **Policy:**

22 **A. Primary Indicators of Performance:**

23 The following indicators of performance apply to the Adult, Youth, Dislocated Worker, National Dislocated
24 Worker Grants, JVSG, and Employment Service programs:

- 25 • Employment Rate (Q2) - The percentage of participants who are in unsubsidized employment during
26 2nd quarter after exit.
 - 27 ○ Youth - The percentage of participants in education or training activities or in unsubsidized
28 employment during 2nd quarter after exit.
- 29 • Employment Rate (Q4) - The percentage of participants who are in unsubsidized employment during 4th
30 quarter after exit.
 - 31 ○ Youth - The percentage of participants in education or training activities or in unsubsidized
32 employment during 4th quarter after exit.
- 33 • Median Earnings – The median earnings of participants who are in unsubsidized employment during the
34 second quarter after exit from the program.
- 35 • Credential Attainment - The percentage of those participants enrolled in an education or training
36 program who attain a recognized postsecondary credential or a secondary school diploma, or its
37 recognized equivalent, during participation in or within one year after exit from the program. Participants

- 38 enrolled in OJT or Customized Training or individuals who receive Title III Employment Services are
39 excluded.
- 40 • Measurable Skill Gains - The percentage of program participants who, during a program year, are in an
41 education or training program that leads to a recognized postsecondary credential or employment and
42 who are achieving measurable skill gains, defined as documented academic, technical, occupational, or
43 other forms of progress, towards such a credential or employment. Individuals who receive Title III
44 Employment Services are excluded.
 - 45 • Effectiveness in Serving Employers - As required by the US Department of Labor (USDOL), Montana is
46 piloting three approaches designed to gauge how well its workforce system is meeting the workforce
47 needs of the state's business community. For each program year, progress is reported to USDOL in
48 Montana's WIOA Annual Statewide Performance Report Narrative.

50 **B. Documentation**

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- 52 1. Employment Rate for the 2nd and 4th quarter after exit and Median Earnings 2nd quarter after exit:
- 53 • To the extent it is consistent with state law, UI wage records will be a primary data source; including
54 private sector, non-profit sector, and government employer wage reports.
 - 55 • Certain types of employment, including but not limited to federal, military, and self-employment, are
56 either excluded from the primary sources of data identified above or very difficult for Montana
57 Department of Labor & Industry (MDLI) to access due to data confidentiality. Therefore, MDLI may use
58 supplemental sources of data to document a participant's entry and retention in employment for those
59 participants not covered by wage records.
 - 60 • Sources of supplemental wage information for the types of employees listed above include:
 - 61 ○ Montana's New Hire Reporting Program
 - 62 ○ Montana Department of Revenue
 - 63 ○ Railroad Retirement System
 - 64 ○ State Wage Interchange System (SWIS)
 - 65 • Other allowable sources of supplemental information for tracking employment-related outcomes include
66 but are not limited to:
 - 67 ○ Tax documents, payroll records, and employer records such as an employer's quarterly tax
68 return; copies of at least two pay stubs; or a signed employer letter on company letterhead
69 attesting to an individual's employment status and earnings;
 - 70 ○ Program participant's follow-up survey;
 - 71 ○ Sales commission income;
 - 72 ○ Case management notes verified by employer; or
 - 73 ○ One-Stop operating systems' administrative records, such as current records of eligibility for
74 programs with income-based eligibility (i.e. Temporary Assistance for Needy Families/TANF);
 - 75 ○ Self-employment worksheets signed and attested to by program participants.
 - 76 • All supplemental data and methods must be documented and are subject to audit.
 - 77 • Supplemental data must be added to the appropriate participant data files in MIS to ensure it will be
78 used when calculating performance.

80 2. Credential Attainment - Documentation consistent with the [WIOA Data Validation Policy and its Federal](#)
81 [Required Source Attachment](#).

82 3. Measurable Skill Gains - Documentation consistent with the [WIOA Data Validation Policy and its Federal](#)
83 [Required Source Attachment](#).

84 **Monitoring and Evaluation:**

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

- 86 • Technical assistance will be provided by the Program Managers and Reporting Analyst.

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88 **References:**

- 89 • [TEGL 26-16 Guidance on the Use of Supplemental Wage Information](#)

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

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