

Special Topics in Accountability Using UI Wage Records to Measure Placement

Speakers:

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Moderator:

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Using UI Wage Records to Measure Placement

- What is the Unemployment Insurance (UI) Wage Record?
- What is the proper procedure for gaining access to UI Wage Records?
- What should states do that cannot use SSNs?
- What special considerations need to be made to ensure that states do not violate the Family Educational Rights and Privacy Act (FERPA) regulations?

Unemployment Insurance (UI) Wage Record

- UI refers to employment covered by state unemployment compensation laws.
- Each state UI law defines criteria that determine who is required to submit a quarterly UI contribution and employment report to the state employment security agency, and which workers are to be included in the quarterly report. Stevens, D. W. (January 2002). "Employment that is not covered by state unemployment insurance laws." *Longitudinal Employer - Household Dynamics. Technical paper No. TP-2002-16.* <http://lehd.did.census.gov/led/library/techpapers/tp-2002-16.pdf>
- UI coverage is broad and basically comparable from State to State. U.S. Department of Labor (1997), *BLS Handbook of Methods*, Bulletin 2490, p. 42.

Quarterly UI Wage Record Common Data Elements (IL)

- **Employee.**

- Identifier/SSN.
- First Name.
- Last Name.

- **Employer.**

- Identifier FEIN.
- UI Account Number.

North American Industry Classification System (NAICS) File

- Acquire companion file from UI State Employment Security Agency containing NAICS codes.
- NAICS Industry Code.
- Employer.
 - Identifier FEIN.
 - UI Account Number.

Why Pursue UI Wage Records? (IL)

- Validity.
- Reliability.
- Comprehensiveness/Coverage.
- Low cost.
- Potential use in other projects.

UI Wage Record Limitations (IL)

- No hours worked.
- No position held/occupation.
- Built in delay in information availability.
- Some excluded populations (relatively small).

Federal Employment Data Exchange System

- **Consider using FEDES to fill gaps.**
 - Department of Defense.
 - United States Postal Service.
 - Office of Personnel Management.
- **<http://www2.ubalt.edu/jfi/fedes/index2.cfm>**

Accessing UI Wage Records

- Establish need and support for the project within Education Agency.
- Identify the in-state UI State Employment Security Agency.
<http://www.servicelocator.org/OWSLinks.asp> and
http://www.servicelocator.org/UI_Filing_search.asp
- Investigate process followed to gain access to UI Wage Records among data/research colleagues in-state and out-of-state who use UI data.
- Develop Perkins specific rationale and documentation for requesting limited access to the UI wage data. (e.g., Perkins Placement in Employment.)

Accessing UI Wage Records

- Identify state statutory authority for Education Agency to study student progress, outcomes, and performance.
- Review/update documentation of existing Education Agency security processes and procedure.
- If the UI State Employment Security Agency has a working relationship with an external vendor that they regularly share UI data with consider working through that vendor. The trusted vendor would be a subcontractor in the education agency's data sharing agreement (e.g., university, another agency, etc.).
- Build on in-state Agency leadership relationships.

Accessing UI Wage Records

- Schedule and conduct face-to-face meeting between appropriate staff at both Agencies and seek approval to move ahead.
- Acquire UI State Employment Security Agency data sharing agreement and review it with Education Agency legal counsel and ranking officials. Expedite the completion and signature gathering process.
- Strictly adhere to the UI State Employment Security Agency's established processes and procedures.
- Share reports/information with officials from the UI State Employment Security Agency.
- Maintain appropriate documentation of the Education Agency's processes and procedures for the inevitable data security audit that the UI State Employment Security Agency will conduct periodically.
- Renew data sharing agreement before it expires.

What Should States Do That Cannot Use SSNs?

- Name matching problematic.
- Develop another common unique identifier for use across UI State Employment Security Agency, Education Agency(s), and potentially other partner agencies/providers.

Adhering to the Family Educational Rights and Privacy Act (FERPA)

- FERPA is a federal law that protects the privacy of student education records, 20 U.S.C. § 1232g; 34 CFR Part 99.
- <http://www.ed.gov/policy/gen/guid/fpco/ferpa/index.html>
- FERPA Notice of Proposed Rulemaking, 34 CFR Part 99. (3/24/2008)
- <http://www.ed.gov/legislation/FedRegister/proprule/2008-1/032408a.html>

Adhering to the Family Educational Rights and Privacy Act (FERPA)

- Maintain minimum cell sizes (5) in tables.
- Properly safeguard individual records.
- Restrict data access.
- Train and regularly retrain existing and new staff on proper processes and procedure for working with UI data.
- Schedule periodic IT reviews and update IT security processes and procedures.

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