

RECOMMENDATIONS TO IMPROVE THE COLLECTION OF PERKINS PLACEMENT DATA IN ALASKA

Submitted by:

MPR Associates, Inc.
2150 Shattuck Avenue, Suite 800
Berkeley, California 94704

July 24, 2007

Contact:
Steven Klein (sklein@mprinc.com)
503-675-6619

BACKGROUND

To assist states in improving the quality of their Perkins accountability data, in December 2006 the Office of Vocational and Adult Education (OVAE), U.S. Department of Education, invited state directors of vocational education to submit requests for individualized technical assistance. In response, the Alaska Department of Education & Early Development (ADEED) submitted an application seeking support in collecting placement data for career and technical education (CTE) concentrators who leave the state following their program completion.

In a joint submission by the state's secondary and postsecondary agencies, Helen Mehrkens, State Program Director, and John Mayer, Postsecondary and Tech Prep Coordinator, requested support in expanding state follow-up of employment data for CTE concentrators, which is currently limited to in-state records and some years of Washington state data. In order to help Alaska collect follow-up data for students working out of state, MPR researchers assessed the feasibility of accessing federal Wage Record Interchange System (WRIS) files to support educational follow-up and to establish interstate record sharing agreements with states that attract a high percentage of Alaska's completers.

This report summarizes MPR researchers' review of state reporting approaches, and provides recommendations to assist EED administrators in expanding employment follow-up for its Perkins accountability system.

TRACKING PLACEMENT DATA

Alaska state administrators use a variety of administrative record matching strategies to track student placement into employment, advanced education and training, or the military. State data sources currently used to track placement outcomes include:

- *Federal Employment Data Exchange System*—includes civilian and military employment records maintained by the Office of Personnel Management, the United States Postal Service, and the Department of Defense.
- *National Student Clearinghouse*—contains records for individuals attending a public or private postsecondary college or university, or enrolled in advanced career training.
- *Alaska Unemployment Insurance Records*—contains records for individuals working within the state of Alaska.
- *Washington State Unemployment Insurance Records*—contains records for individuals employed within the state of Washington.
- *Alaska Business and Occupational License Files*—contains records for individuals self-employed within the state of Alaska.

Data reported on OVAE’s Peer Collaborative Resource Network website,¹ indicate that Alaska state administrators have little difficulty tracking secondary CTE concentrators who complete their education and go on to some form of postsecondary experience. For example, of the 2,620 secondary CTE concentrators graduating in the 2002–03 academic year (i.e., the numerator of measure 2S1), 2,529 were identified for follow-up in 2003–04 (i.e., the denominator of measure 3S1)² [Table 1]. Moreover, of the number identified for follow-up, 2,030 unduplicated individuals were identified as placed in employment, advanced education, or the military (i.e., the numerator of measure 3S1). Consequently, the state was able to report a positive placement for 80 percent of individuals identified for follow-up in the year following their high school completion.

These statistics do not explain what became of the 91 CTE concentrators who completed high school in the 2002–03 academic year, but who were not identified for follow-up in the next year (i.e., 2,620 CTE completers in 2002–03 less the 2,529 in 2003–04 for whom follow-up occurred). Also unknown is the status of the 499 individuals in 2003–04 who were not found employed, enrolled in postsecondary education, or in the military (i.e., 2,529 CTE completers in 2003–04 less the 2,030 in 2003–04 found to be positively placed). If a large number of these students were

¹ State data can be accessed at www.edcountability.net. Access to state data is password protected, with each state director given a user name and password. Contact Helen Mehrkens at (907) 465-8730 for information on accessing state-level data.

² Although states are now in the 2006–07 program year, data for the 2004–05 year had not yet been released at the time of this memo. The state defines its placement measure as the “Percent of completers who leave secondary school in the report year, were at least enrolled in their third year of high school, and who were placed in postsecondary education or advanced training, employment and/or military service within 6–12 months.”

successfully tracked and simply not placed, then the state may have relatively little to gain in expanding its statewide reporting to include out-of-state completers.

Table 1: Secondary and Postsecondary Perkins Placement Survey Response Rates: 2003-04

	Number Completers 2002-03	Number Completers Followed-up in 2003 -04	Number Completers Positively Placed in 2003- 04	Number Completers in 2002-03 Missing (added) in 2003-04 Follow-up	Number Completers Not Positively Placed at Follow-up in 2003-04
Secondary	2,620	2,529	2,030	91	499
Postsecondary	1,297	6,408	5,530	(5,111)	878

Source: OVAE Peer Collaborative Resource Network, State data. www.edcountability.net. Accessed 4/26/07.

A review of postsecondary follow-up data paints a different picture. According to results posted on the federal website, 1,297 CTE concentrators completed a postsecondary degree, certificate, or credential in the 2002–03 academic year.³ However, postsecondary placement data for 2003–04 indicate that the state conducted follow-up of 6,408 students, 5,111 more than actually graduated the preceding year. According to state administrators, Alaska follows-up on all CTE concentrators leaving postsecondary education in the preceding program year (including those who did not complete a degree, certificate, or credential). To clarify the population that should be included in the measure under Perkins IV, state administrators may wish to review their reporting methodology with their OVAE Regional Accountability Specialist prior to finalizing their new measures.

³ The state definition for postsecondary placement in 2003–04 was reported as the “Percent of completers from the previous reporting year who were placed in further postsecondary education or advanced training, employment, and/or military service within 6 months of leaving postsecondary school.”

WAGE RECORD INTERCHANGE SYSTEM

The Wage Record Interchange System (WRIS) was created by the federal government to assist states in responding to performance and reporting requirements contained in the Workforce Investment Act of 1998 (WIA) and programs authorized under the Wagner-Peyser Act. The WRIS serves as a clearinghouse for state Unemployment Insurance (UI) wage record data, which states may access to track the employment outcomes for individuals who participated in a state workforce investment program and subsequently left the state. States volunteering to join the WRIS agree to share UI wage record data with the Clearinghouse and other states, and in return, may access wage record data from participating members.

Until the summer of 2006, the National Association of State Workforce Agencies administered the WRIS; however, in July 2006 the Employment and Training Administration (ETA) took over WRIS administration and governance. During the transition, 11 states withdrew from the WRIS over administrative concerns. Over time, 6 of these states have rejoined, and new states have signed on. As of April 2007, a total of 30 states and territories were participating. These states and territories include:

Alaska	Maryland	Oklahoma
Arizona	Minnesota	Oregon
Arkansas	Mississippi	South Dakota
District of Columbia	Missouri	Texas
Florida	Montana	Utah
Idaho	Nebraska	Virginia
Illinois	Nevada	Washington
Indiana	North Carolina	West Virginia
Kansas	North Dakota	Wisconsin
Kentucky	Ohio	Wyoming

Since WRIS data are only available for states participating in the WRIS, individuals employed in states not referenced above would not be available for employment tracking purposes.

To participate in the WRIS, a state must sign a contract with ETA that specifies the conditions and procedures governing data access. Under the agreement, states identify a State Unemployment Insurance Agency (SUIA) that holds wage data, irrespective of whether the agency also administers the state's UI program, and a Performance Accountability and Customer Information Agency (PACIA), or agencies, designated by the governor, with responsibility for coordinating performance assessment under WIA.

Assessing the WRIS Clearinghouse

The WRIS Clearinghouse (Clearinghouse) operates as an intermediary among states. Each state SUIA submits data to the Clearinghouse for all individuals with employer-reported wages in a given time period. State data are entered into the Clearinghouse database, which maintains wage record data for up to eight quarters. This database contains only three information items: (1) an

individual's Social Security Number (SSN), (2) the quarter for which wages have been reported, and (3) the name of the state holding the detailed wage record information.

When wage record data are needed, for example to prepare for a federal accountability report, a state PACIA transmits a request file to the WRIS Clearinghouse that contains the SSNs of individuals for whom employment data are needed. Clearinghouse staff performs a record match against the centralized database to identify whether there are any wage data associated with the submitted SSNs, and matched records are noted. WRIS staff consolidate PACIA requests into state-level queries, which are then sent to each SUIA holding associated wage data. These queries, which consist of lists of SSNs, may include requests from different state PACIA for information held by a single SUIA.

Once a SUIA receives a query, it attempts to match the SSN in the file against information held in its own database. A response file, containing the requested wage record data for identified SSNs, is returned to the WRIS Clearinghouse, where staff extracts wage record data and converts it into aggregate statistical data. These data can be used by a PACIA to prepare performance and management reports for programs covered by the WRIS. Once a data request has been fulfilled, a state PACIA has 14 days to download the information; after this time, the WRIS Clearinghouse automatically purges the file from its server.

The WRIS Data Sharing Agreement advises that a PACIA may make requests for wage record data for the following purposes:

1. To obtain Wage Data for performance and reporting requirements for state and local programs within the jurisdiction of the Department of Labor, including those authorized under: (i) Title I of the Workforce Investment Act; (ii) Section 403(a)(5) of the Social Security Act (42 USC 603(a)(5)); (iii) Chapter 2 of Title II of the Trade Act of 1974 (19 USC 2271 et seq.); (iv) Wagner-Peyser Act programs, and (v) Chapter 41 of Title 38 of the United States Code;
2. To allow the PACIA or other state agency to assess the performance of individual training providers under the Workforce Investment Act;
3. To allow the PACIA to obtain Wage Data used to satisfy the performance and reporting requirements for the Job Corps Program, Senior Community Service Employment Program, Migrant and Seasonal Farm Worker Program, Native American Program, Veterans Workforce Investment Program, Youth Build Program, Registered Apprenticeship Program, Prisoner Reentry Initiative Grant Program, H-1B Technical Skills Training Grant Program, and the Community-Based and High-Growth Job Training Initiative Grant Program;
4. To allow the PACIA or other state agency to address performance and reporting requirements set forth in state statute for programs and activities identified in subparagraphs 1 through 3 of this paragraph C;
5. To obtain data for research and evaluation;

6. To allow the PACIAs to comply with requirements affecting expansion of the WRIS that is set forth in any of the following: (i) federal law; (ii) regulations promulgated by the Secretary of Labor; and, (iii) policy determinations issued by the Secretary of Labor;
7. As may be necessary to assist ETA with administering and managing the WRIS; and,
8. As may be necessary to assist the Operations Contractor with operating and troubleshooting the WRIS.⁴

Although the Data Sharing Agreement does not stipulate the use of WRIS data for Perkins purposes, in her Transmittal Letter of November 7, 2006, Emily DeRocco, Assistant Secretary for Employment and Training, U.S. Department of Labor, encouraged states to make use of the WRIS to help build an integrated workforce investment system. In particular, her transmittal letter noted:

“Educational agencies are a critical partner in this enterprise and require access to the same resources to report performance data as workforce agencies. I strongly urge you to consider designating your state agency as an additional PACIA covered by this data agreement.”⁵

The reference to educational agencies using the WRIS was added to the transmittal record in the hope that states would expand their use of WRIS data to more fully document the performance of their workforce investment system.

According to John R. Beverly, Administrator, Office of Performance and Accountability, U.S. Department of Labor, the question of whether states are authorized to access the WRIS to collect performance data identified in the Perkins Act is an unresolved issue. Since Perkins is not explicitly listed among programs identified in Section 3 of the Data Sharing Agreement (see above), ETA has not yet given formal permission for states to access the WRIS for Perkins reporting purposes. However, since no federal provision prohibits states from using WRIS data to assess Perkins or any other federal or state workforce program, so long as confidentiality provisions are maintained, the potential for states to use the WRIS for Perkins reporting still exists. According to Mr. Beverly, the U.S. Department of Labor is currently considering whether to open the WRIS for Perkins reporting purposes, which will require proposing an amendment to the current data sharing agreement. Until formal approval is granted, he recommends that states not access the WRIS for Perkins accountability purposes.

It is worth underscoring that any state that belongs to the WRIS can propose an amendment to the data sharing agreement for consideration by other states. As such, Alaska state administrators may wish to consider offering an amendment to the WRIS to allow PACIA to submit queries to

⁴ These criteria are drawn from the WRIS Data Sharing Agreement with March 2007 Proposed Amendments, posted on the U.S. Department of Labor website. This document was accessed on 4/27/07 at www.doleta.gov/Performance/WRIS%20Data%20sharing%20Agreement%20with%20March-07_Amendments.pdf

⁵ <http://www.doleta.gov/Performance/WRIS%20Transmittal%20letter%20FINAL%2011-07-06.pdf> accessed on 4/27/07.

the Clearinghouse for Perkins reporting requirements. This would likely require consultations with staff at the Alaska SUIA, as well as other state administrators.

Using WRIS Data for Perkins Reporting in Alaska

Assuming that ETA opens the WRIS for state Perkins reporting purposes, staff of the ADEED should have little difficulty tracking the employment outcomes of secondary and postsecondary CTE concentrators who migrate to other participating states. Since the Alaska Workforce Investment Board, located within the Department of Labor, already manages postsecondary Perkins programs, state officials should have ready access to SSNs for CTE concentrators. Data provided by the University of Alaska and the Alaska Vocational Technical Education Center are also available for use.

Although the ADEED does not require secondary students to report their SSN, the agency currently collaborates with the Alaska Department of Labor and Workforce Development to indirectly identify CTE concentrators' SSNs. To do so, the ADEED forwards to the Department of Labor's Research and Analysis Section a list of CTE concentrators who completed their education, using data forwarded to the agency by school district. These data include directory information (e.g., name, birth date, address), which is matched against data records held in the state's Permanent Fund Dividend Division. Since SSNs are associated with individuals' Permanent Fund Dividend Division file, the workforce development agency is able to obtain SSNs for individuals for whom a match can be achieved. These SSNs are then run against state UI wage record files to identify CTE concentrators working within Alaska or in Washington State. Since this match is done entirely within the Department of Labor and Workforce Development agency, no SSNs are ever disclosed to ADEED staff.

The state would follow a similar process to access WRIS data, with the exception that SSNs for secondary CTE concentrators would be packaged into a data request file submitted by the Alaska workforce development agency to the WRIS Clearinghouse. Once a response from other SUIA were received, staff from the WRIS Clearinghouse would share aggregated wage record data with the Alaska labor and workforce development agency, which, in turn, would forward this information to the ADEED after stripping concentrators' SSNs from the file.

ESTABLISHING INTERSTATE RECORD SHARING AGREEMENTS

Alaska currently uses Unemployment Insurance (UI) wage records to identify career and technical education (CTE) concentrators employed within the state,⁶ and has negotiated a record sharing agreement that allows state administrators to track CTE concentrators who find employment in neighboring Washington State. If the Wage Record Interchange System (WRIS) is not made available to states for Perkins purposes, Alaska state administrators may wish to consider negotiating UI wage record sharing agreements with other states that attract a high percentage of Alaska's CTE concentrators. This would require that state administrators collect information on popular destinations for high school and college graduates who complete their studies and subsequently emigrate from the state.

The state could have a number of options for identifying where individuals relocate, including asking local school districts and college staff to survey CTE completers on their post-program plans, reviewing information contained within the Alaska Permanent Fund to identify states where a larger percentage of dividend checks are mailed, and identifying states where students appearing in the National Student Clearinghouse reside. Once identified, state administrators would follow the same process for establishing interstate record sharing agreements as is currently employed with Washington State.

According to state administrators, the Alaska Department of Education & Early Development (ADEED) has in the past attempted to identify popular destinations for CTE concentrators who completed their program and subsequently left the state. Results suggested that these students were spread widely across the country. While the strategies proposed in this memo could help improve identification of states attracting large numbers of CTE completers, it may be that Alaska's CTE completers are spread across a sufficient number of states to make follow-up inefficient. It may also be that completers do not seek postsecondary employment or training. Indeed, since state administrators are able to access data contained in the Alaska Permanent Fund Dividend files to determine current residency status, it is possible that the number of individuals for whom data are missing is relatively small.

To assess rates of out-of-state migration, state administrators should attempt to quantify the number of secondary and postsecondary CTE concentrators who complete a program in the preceding academic year and who are not counted as positively or negatively placed in employment, advanced education, or the military in the subsequent year. If the number were low, the state could seek approval from OVAE to net out students who cannot be traced within state (or in Washington State) using existing methods.

Alternatively, if the number of unaccounted for concentrators is sufficiently large, then state administrators could choose to negotiate UI wage record sharing agreements with one or more states that attract large numbers of Alaska's CTE completers. Since much of the cost of following up on students is the result of the effort involved in negotiating UI wage record sharing

⁶ The state also assesses federal military and civilian payroll records through the Federal Employment Data Exchange System (FEDES), Alaska business license files, and Alaska occupational license files.

agreements, Alaska administrators may seek to develop a standardized procedure for routinizing the establishment of data-sharing agreements with other states.