

POLICIES AND PROCEDURES
FOR JOB CORPS' PROGRAM YEAR 2009
PERFORMANCE MANAGEMENT SYSTEM

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INTRODUCTION

**POLICIES AND PROCEDURES FOR JOB CORPS’
PY 2009 PERFORMANCE MANAGEMENT SYSTEM**

INTRODUCTION

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POLICIES AND PROCEDURES FOR JOB CORPS’ PY 2009 PERFORMANCE MANAGEMENT SYSTEM

INTRODUCTION

A. General. Job Corps utilizes a comprehensive performance management system to assess program effectiveness in a variety of areas. The purposes of establishing and maintaining such a system are threefold:

- 1) to meet federal and legislative accountability requirements for the Job Corps system;
- 2) to assess centers’ and agencies’ accomplishments in implementing program priorities and serving students effectively; and,
- 3) to have a management tool that provides useful and relevant feedback on performance, while encouraging continuous program improvement.

Job Corps’ performance management system is comprised of four outcome measurement systems, results of which are shown in the following report cards:

✓	Outreach and Admissions (OA) Report Card	OAOMS-10
✓	Center Report Card	OMS-10
✓	Career Transition Services (CTS) Report Card	POMS-10
✓	Career Technical Training Report Card	CTTRC

Each outcome measurement system assesses performance in specific areas of responsibility with respect to serving students throughout the Career Development Services System (CDSS). Combined, these outcome measurement systems provide a comprehensive picture of performance throughout all phases of students’ Job Corps experience. Thus, it is critical that the systems be closely aligned to both encourage collaboration in delivering quality services to students and provide an accurate reflection of efforts towards meeting clearly defined program goals.

To add to the quantitative components of the performance management system, there is an additional element that evaluates center quality, providing a more comprehensive view of the program’s performance. This Center Quality Assessment is composed of three factors: an On-Board Strength (OBS) rating, a Quality Rating (QR), and a Student Satisfaction Survey (SSS) rating. More information regarding the quality assessment of

centers can be found in Appendix 501a.

- B. Background.** The Workforce Investment Act (WIA) became law in August 1998, mandating major changes for Job Corps’ performance assessment. The WIA included an increased focus on accountability and contained core indicators of performance for Job Corps concerning recruitment, education and placement rates, wages, and long-term outcomes of graduates after initial placement that related to the Government Performance and Results Act (GPRA). Under the President’s 2001 Management Agenda, a performance management system with one core set of definitions, measures, and procedures (common measures) was to be implemented across federal programs with similar goals. In PY 2004, Job Corps began the process of moving towards reporting the four indicators specified by “Common Measures,” specifically, placement in employment or higher education, attainment of a degree or certificate, literacy and numeracy gains, and efficiency/cost per participant. The Office of Job Corps will continue in PY 2009 to move towards fully reporting common measures per the Employment and Training Administration’s (ETA’s) issued guidelines and as approved by the Office of Management and Budget (OMB).

As with prior years, Job Corps is committed to serving every student who enrolls in the program, despite WIA’s focus primarily on program “graduates” and their long-term outcomes. The “*every student counts*” philosophy continues particularly in light of reporting common measures.

- C. Approach.** The customary process for updating and refining the performance management system is to assemble a team of Job Corps professionals (representatives from Job Corps centers, agencies, Regional Offices, and Job Corps senior management) to review the current system, assess whether it accurately reflects performance and program priorities, and provide input to the National Director for the next program year.

For PY 2009, in an effort to provide more stability and consistency to the OMS, the National Director determined that no changes would be made to the Report Card *measures, goals* and *weights* from the previous program year. This allows centers, OA agencies, and CTS providers to continue focusing on program changes to meet existing measures, and to determine the efficacy of such changes. For this reason, an OMS Workgroup was not convened to provide input for the PY 2009 measurement systems.

D. Design of the PY 2009 Performance Management System. The PY 2009 performance management system is identical to the previous program year’s OMS. While no modifications have been made for PY 2009, the performance goals continue to remain ambitious and yet attainable, align with the priorities of both the National Director and OMB, and reflect both recent labor market conditions and internal programmatic changes currently faced by centers and agencies. The design of the performance management system is as follows:

1. Zero Tolerance (ZT). The Job Corps program has a strict policy of zero tolerance for drugs and violence, and requires that all students sign a commitment to remain drug and violence-free.

(a) ZT for Purposes of Exclusion in OMS Pools. One who has remained in Job Corps less than 30 days and exits under code 5.1a or 5.2b, or one who has remained in Job Corps less than 45 days and exits under code 5.2a (Level 1 ZT infractions) are excluded from OMS pools. Level 1 ZT infractions generally include offenses that are deemed violent or involve drugs, as detailed below.

Note: Students who exit due to Level 1 ZT infractions within 30/45 days are *not* included in the Center Report Card. Students who exit due to Level 1 ZT infractions after 30/45 days, however, are included in all pools for on-center measures and credit will be given for academic and CTT credentials earned prior to exit.

However, since all students who exit due to Level 1 ZT infractions, regardless of timing (within or after 30/45 days), are not considered former enrollees or graduates, they are ineligible for post-center services and are therefore *excluded* from all post-center pools in both the Center and CTS Report Cards.

(b) Zero Tolerance (ZT) Policy – Level 1 Infractions. Level 1 ZT infractions can be found in the Job Corps Policy and Requirements Handbook (PRH), Chapter 3, Exhibit 3.1 (Infraction Levels and Appropriate Center Actions), and are listed as follows:

Exit Code 5.1a: 1) Possession of gun or illegal weapons on center or under center supervision

- | | | |
|-----------------|----|--|
| | 2) | Physical assault that causes bodily harm to student or staff |
| | 3) | Sexual assault of a criminal nature |
| | 4) | Robbery and extortion |
| | 5) | Arson |
| | 6) | Arrest for a felony on or off center |
| Exit Code 5.2b: | 7) | Possession, distribution, or sale of drugs on center or under center supervision |
| | 8) | Conviction of drug use, possession, or sale off center (felony or misdemeanor) |
| Exit Code 5.2a: | 9) | Use of drugs as evidenced by a positive drug test conducted by the end of the initial probationary periods (prior to 45 days) or the suspicion intervention period (prior to 45 days) or by a positive drug test after the suspicion intervention period |

2. Definitions of Student Separation Status. The criteria for graduate, former enrollee, and uncommitted student, as defined in PRH Chapter 4, Section 4.2, shall apply to the performance management system.

- (a) **Graduate** – one who has completed 60 or more calendar days enrollment and has completed the requirements of CTT, or earned a High School Diploma (HSD) or its equivalent GED (General Educational Development), or who completes both, while enrolled in Job Corps. Students who have exited for any Level 1 ZT infraction, at any time, do not qualify.
- (b) **Former Enrollee** – one who has completed 60 or more calendar days enrollment, has not attained graduate status, and whose exit is for reasons *other than* any Level 1 ZT infraction).
- (c) **Uncommitted Student** – one who has remained in Job Corps less than 60 calendar days (regardless of achievement), or who has exited for a Level 1 ZT infraction at any time.

Note: Level 1 infractions can be found in the Job Corps PRH, Chapter 3, Exhibit

3.1 (Infraction Levels and Appropriate Center Actions) and above.

3. Core Components. Each of Job Corps' outcome measurement systems consist of four basic components: results-oriented measures, goals, weights, and an overall rating.

- Performance *measures* reflect the program priorities and objectives important to Job Corps' mission and are measurable and consistent throughout the system.
- Performance *goals* are quantitative benchmarks that are set to establish a desired level of performance.
- Relative *weights* are assigned to performance measures to indicate areas of emphasis among responsibilities for serving students.
- The *overall rating* is the way in which results for the measures are aggregated and evaluated.

The Center Quality Assessment is composed of three discrete measures – On Board Strength (OBS), the Quality Rating (QR), and the Student Satisfaction Survey (SSS). Each of these elements is independent of the others and there is no aggregation of results across each of the measures. These three measures are valuable management tools that complement the other systems by assessing the quality of services provided by Job Corps and capturing information on aspects of center life that are not accounted for in the other management systems. These aspects include Job Corps center capacity utilization (OBS), assessment of center operations (QR), and student satisfaction with respect to safety (SSS).

4. Performance Goals. As mentioned above, performance goals are the quantitative benchmarks for the outcome measurement systems, where each outcome measure is scored against a single performance goal. Performance is reported as a percentage of the goal(s) achieved.

Example: If the goal for HSD/GED Attainment Rate in the Center Report Card is 50%, and a center has a HSD/GED Attainment Rate of 45%, then its *rating* on that measure would be 90%, meaning that the center has reached 90% of the goal ($45/50 = 90$). The rating indicates there is room to grow in achieving the goal.

Performance goals may be national goals or model-based goals:

- (a) National Goals.** National goals are set and applied to all centers, OA, or CTS providers equally for the same measure.

(b) **Model-based Goals.** Model-based goals are used for certain measures to ensure equity in making comparisons of performance across centers and agencies by statistically adjusting for circumstances that are beyond the operator's control. A model helps to ensure fairness by formally recognizing that actual performance on a given outcome measure depends not only on management practices, but also in part on the abilities of the students it receives and the characteristics of the environment in which it operates. Setting individualized goals that adjust for differences in key factors that are beyond the operator's control helps to "level the playing field" in assessing performance. A model is calculated by estimating the effect of various factors on the achievement of the measure using a regression model. The cumulative effect of these factors provides the percentage by which the national goal should be adjusted (upward or downward) for each center and CTS agency. Note that the model-based goals for one center can significantly differ from other centers in the same state or Region, as the goals are calculated using a combination of center-specific and local county economic data.

(1) **PY 2009 Model-Based Goals.** The following measures in the Center and CTS Report Cards use model-based goals:

- HSD/GED Attainment Rate
- Average Literacy Gain
- Average Numeracy Gain
- Graduate Average Wage at Placement
- Graduate 6-Month Average Weekly Earnings

(2) **Appeal Process for Model-Based Goals.** Model-based goals are developed using the most recent data available. As a result, the goals should accurately represent the factors beyond the control of a center or CTS agency that impact the achievement of the specific measure. An appeal of a model-based goal may be filed, however, if there are new or extenuating circumstances which cannot be resolved during the program year, and that have not already been factored into the model. The appeal must include a written request outlining the justification for the appeal and supporting data and/or

official documentation supporting the appeal. For example, if there are significant changes in GED testing requirements in the locality or state in which a center is located which could potentially impact the center's ability to achieve its goal, and which were not included in the development of that center's goal, then the center may send an appeal with official documentation indicating the new requirements and the date these requirements took effect. The National Office will review the request and documentation and determine if the appeal will be granted.

The appeal is to be sent to:

US Department of Labor/Office of Job Corps
200 Constitution Avenue, NW
Washington, DC 20210
Attention: Program Performance Team

- 5. Weights and Overall Rating.** Weights are assigned to each OMS report card measure to reflect areas of emphasis in accountability for achieving positive student outcomes. The overall rating is the way in which results across all of the measures are aggregated to create an overall rating. Overall ratings are also used to determine the performance ranges for performance-based service contracting. The following is an illustration of how an overall rating is calculated:

SAMPLE MANAGEMENT SYSTEM REPORT CARD:

Measure	Goal	Actual Performance	% of Goal Achieved	Weight	Rating*
Measure 1	75%	79%	105%	40%	42.0%
Measure 2	60%	54%	90%	25%	22.5%
Measure 3	95%	90%	95%	35%	33.3%
<u>Formulas:</u>					97.8%
*% of goal achieved x weight = rating					Overall
Sum of Ratings = Overall Report Card Rating					Report Card Rating**

Note: On the Career Technical Training Report Card (CTTRC), each indicator will be capped at 100% (unlike the above example).

- 6. Format of Performance Reports.** In PY 2009, the format for reporting performance for all measures will continue to be a rolling, 12-month format. Rolling reports cover a 12-month reporting period and “roll over” each month to a new, 12-month period. The reports do not begin anew at the start of a new program year. Data will continue to be reported using the 12-month rolling format when a new contractor takes over the operation of an existing center. New centers, however, will begin with one month of data and will build up to a rolling report by the 13th month.
- 7. Effective Date.** Data reporting under the PY 2009 system begins on July 1, 2009. The first reports reflecting PY 2009 outcomes (period ending July 31, 2009) are expected to be issued in August 2009.

E. Current Policies for PY 2009 OMS. Provided below are policies that are in effect for PY 2009:

- 1. Grace Period for New Centers.** Prior to PY 2007, new centers were granted a one-year grace period during which they were not held accountable, to the same degree as more established centers, for outcomes and performance results. Effective PY 2007, the grace period for newly opened centers was increased from one year to two years, primarily to allow sufficient time for students to enroll and progress through all stages of CDSS and to have student data populate in all performance pools. The grace period was extended to two full years based upon average length of stay (ALOS) for all students and for graduates, as well as time required for students to populate the 6- and 12-month follow-up pools. The two-year grace period is calculated from the start date of the contract, not when the center “opens” for new students. Performance outcome data will still be captured in CIS as students enter and are separated, but the center will not be held accountable for purposes of OMS, Performance-based Service Contracting (PBSC), and Automated Past Effectiveness.

(Center Report Card)
- 2. Students who are Medical Separations with Reinstatement Rights (MSWRs).** As per the PRH, Chapter 6, Section 6.4, R5a, students who are medically separated with reinstatement rights (MSWR) are allowed an expedited return within 180 days if the medical condition has been resolved.

JCDC will report the student outcomes only at the time of *final* separation. Thus, OMS outcomes for a MSWR student will be recorded either at 180 days after MSWR if the student does not return to the program or at final separation if the student resumes participation in the program.

The following summarizes how specific instances are recorded on the OMS:

- (a) Student is reinstated back to the Job Corps center before the 180 days ends. Student outcomes will be reported at the time of separation.
- (b) Student did not return to the Job Corps center within the 180 days. In this case, at the end of the 180 days, the system will automatically "close-out" the MSWR. At that time, the system will determine the student's separation status and placement services eligibility status. If the student is eligible for placement service, he or she will be active for CTS providers to enter placement data in CTS. The placement service period will start at the 181st day and the 6- and 12-month follow-up timeframes will be based on the date the student initially reported to work or school.
- (c) Student notifies the center before the 180 days ends that he or she does not intend to return to the Job Corps center. (This could occur if the student found a job or would like the transition allowance money to be released.) In this case, the center will perform "MSWR Early Close-Out" in the Center Information System (CIS). The "close-out" date will be the date the student officially notified the center. At that time, the system will determine the student's separation status and placement service eligibility status. If the student is eligible for placement service, he or she will be active in the CTS system for CTS providers to enter placement data. The 6- and 12-month follow-up time frames will still be based on the placement date reported if the student is employed or enrolled in an education program.

(OA, Center, CTS, and CTT Report Cards)

3. **Students who are Administrative Separations with Reinstatement Rights (ASWR).** As per the PRH, Chapter 6, Section 6.4, R5a, administrative separations with reinstatement rights (ASWR) are allowed an expedited return within 12 months.

JCDC will report the student outcomes only at the time of *final* separation. Thus, OMS outcomes for a ASWR student will be recorded either 12 months after

ASWR if the student does not return to the program or at final separation if the student resumes participation in the program.

The following summarizes how specific circumstances are recorded on the OMS:

- (a) Student is reinstated back to the Job Corps center before the 12 months ends. Student outcomes will be reported at the time of final separation.
- (b) Student did not return to the Job Corps center within the 12 months. In this case, at the end of the 12 months, the system will automatically "close-out" the ASWR. At that time, the system will determine the student's separation status and placement services eligibility status. If the student is eligible for placement service, he or she will be active for CTS providers to enter placement data in CTS. The placement service period will start at the 366th day and the 6- and 12-month follow-up timeframes will be based on the date the student initially reported to work or school.
- (c) Student notifies the center before the end of the 12 months that he or she does not intend to return to the Job Corps center. (This could occur if the student found a job or would like the transition allowance money to be released.) In this case, the center will perform "ASWR Early Close-Out" in the Center Information System (CIS). The "close-out" date will be the date the student officially notified the center. At that time, the system will determine the student's separation status and placement service eligibility status. If the student is eligible for placement service, he or she will be active in the CTS system for CTS providers to enter placement data. The 6- and 12-month follow-up time frames will still be based on the placement date reported if the student is employed or enrolled in an education program.

(OA, Center, CTS, and CTT Report Cards)

- 4. Deceased Students.** In the event of a student's death either during or after enrollment in Job Corps, he or she will be removed from applicable performance data pools. In the event of death during enrollment, the student will be removed from *all* Center, CTS, and Career Technical Training Report Card outcome pools. In the event of death after separation and during the eligible CTS period, the student will be removed from CTS, and Report Card placement pools. These students will also be removed from follow-up survey queues. Regional Office approval is required in order for the JCDC to process these removals. The

Regional Office must notify the JCDC within 3 months of the student's death.

(OA, Center, CTS, and CTT Report Cards)

- 5. Policy for Crediting Transfers to Advanced Training (AT) Programs.** Job Corps policy for crediting centers in situations where graduates are transferred to AT programs is outlined below. Tables summarizing the crediting policy are attached to Appendices 501a and 501d.

- (a) General.** The AT Transfer Policy applies solely to those cases where a student physically transfers to a *different* center to enroll in its AT program. The underlying philosophy behind the policy for AT credit is that sending and receiving centers should be held accountable for the specific outcome measures and accomplishments that are earned while the students are at their respective centers.

Placement and post-placement accomplishments are credited to both the sending and the AT centers as incentives to encourage centers to transfer students to AT programs. The AT centers, however, are not credited for in-program accomplishments achieved at the sending center, nor can they obtain credit for any in-program measures beyond that of CTT completion when the student completes the AT program.

In those cases where both the sending center and the AT center are credited for the same measure, the regional total and national total count the credit only once. In other words, the regional and national totals do not double count credits for one student's accomplishments.

All students who transfer to an approved AT program must meet the advanced program's eligibility requirements.

Note: In situations where a student enters the AT program at the *same* center (that is, the sending center and AT center are one and the same), the student is not considered an AT transfer and the following policy regarding crediting is not in effect. Students that enter an AT program at the same center will be placed in the pools for the on-center measures (HSD/GED attainment, CTT completion, average literacy gains, and average numeracy gains) upon separation from Job Corps. Additionally, the Minimum Productivity Rule (MPR) for the Career Technical Training Reporting and Improvement System (CTTRIS) will not be adversely impacted when the student enters the AT program at the same center.

Please note, however, the MPR continues to be temporarily suspended for PY 2009.

(b) Sending Centers:

(1) Credits for Transferring Graduates to AT Programs. At the time of the transfer:

- The sending center will receive an education placement credit for both the Post-Enrollment Placement Rate measure and the Graduate Placement Rate measure. (These education placements will in turn be replaced by applicable placement credits if the student is subsequently placed in a job after separating from the AT center.)
- The sending center will receive applicable credits for all in-program measures. For PY 2009, this includes:
 - the HSD/GED Attainment Rate;
 - the CTT Completion Rate;
 - the Average Literacy Gain; and,
 - the Average Numeracy Gain.

(2) Credits at Separation, Placement, and Post-Placement. At the time of separation from the AT center:

- The sending center will not receive any credits for in-program measures that are earned while the student is at the AT center.
- The sending center will receive “flow back” credits as applicable for the placement and post-placement measures. Specifically, if the student is placed in a job after terminating from the AT center, the student will be placed in the sending center’s graduate wage rate and JTM/PSC pools and will receive credits as applicable. If a student is placed in post-secondary education/training after terminating from the AT center, the student will be placed in the sending center’s JTM/PSC pools and will receive credit as applicable.

- In addition, for students who respond to the 6-month survey, the student will be put in the sending center's pool for the 6-Month Follow-Up Placement Rate measure and will receive credit as applicable for that measure based on the answers to the survey questions. If the placement is a full- or part-time job, the student will be placed in the 6-month weekly earnings measure pool and the sending center will receive credit for the student's earnings as calculated based on the information provided in the survey.
- For students who respond to the 12-month survey, the student will be placed in the sending center's pool for the 12-Month Follow-Up Placement Rate measure, and will receive credit as applicable for that measure based on the answers to the survey questions.

(c) **AT Centers: Credits at Separation, Placement, and Post-Placement.**

At the time of separation from the AT center:

- The student will be put in the AT center's pool for the CTT Completion Rate measure. The credit for this measure will only be based on the student's accomplishments while at the AT center. That is, if the student completed his or her vocation at the sending center, but did not complete the trade at the AT center, the AT center would not receive credit for the CTT Completion Rate measure. However, from the perspective of the Job Corps program, the student will be regarded as a CTT completer (having completed a CTT program at the sending center) and as noted below, will be put in the JTM/PSC pool if they are placed in a job or post-secondary education/training after separation.
- The student will not be put in the pool for the HSD/GED Attainment Rate, Average Literacy Gain, or Average Numeracy Gain at the AT center.
- The AT center will receive credits as applicable for the placement and post-placement measures. Specifically, the student will be placed in the AT center's pools for the Post-Enrollment Placement Rate measure, the Graduate Placement Rate measure, and will

receive credit as applicable. If the student is placed in a job or post-secondary education/training, the student will be placed in the JTM/PSC Placement pool for the AT center and the center will receive credits as applicable. If placed in a job, the student will also be placed in the graduate wage pool for the AT center and the center will receive credits as applicable.

- In addition, for students who respond to the 6-month survey, the student will be put in the AT center's pool for the 6-Month Follow-Up Placement Rate measure and will receive credit as applicable for that measure based on the answers to the survey questions. If the placement is a full- or part-time job, the student will be placed in the 6-month weekly earnings measure pool and receive credits for the student's earnings as calculated based on the information provided in the survey.
- For students who respond to the 12-month survey, the student will be put in the AT center's pool for the 12-Month Follow-Up Placement Rate measure, and will receive credit as applicable for that measure based on the answers to the survey questions.

(d) Multiple AT Transfers: Credit at Transfer, Separation, Placement and Post-Placement. If a student transfers from one center to another center to enroll in an AT program and then subsequently transfers either back to the sending center, or to another center, credit is assigned as follows:

- The center that first transfers a student to an AT program at another center is the only center that will receive an automatic education credit for the placement measure. No subsequent center that the student transfers from will receive an automatic placement education credit at the time of the transfer.
- The student will be placed in the CTT completion pool at all subsequent new centers transferred to, regardless of whether a vocation is completed while at that center. **Note:** If the student transfers back to the sending center, the student will not be placed in that center's CTT completion pool again.
- The first center and all subsequent centers are accountable for post-

center measures, regardless from which center the student finally separates.

(Center and CTT Report Cards)

6. Policy for Crediting CTS Agencies When CTS-Assigned Students Relocate to a Different Service Area. Job Corps’ policy for crediting CTS agencies in situations where a student moves from one CTS location to another is detailed below, and is also presented in table format in Appendix 501c, Attachment 3 – Crediting Chart for CTS Agencies When Students Relocate to a New Service Area. This policy is aligned with PRH Chapter 4, Section 4.3 R5 – “Relocations” (dated November 8, 2005) and has been in effect for all students assigned to a CTS provider as of July 1, 2005.

(a) Former Enrollees. Policy for CTS agency credit for former enrollees differs from that for graduates since the former enrollee placement window is limited to only three months. For former enrollees, credit is applied as follows:

- If the receiving CTS agency does not place the former enrollee while the placement window is active, the initial provider is the agency of record for all applicable PY 2009 CTS Report Card measures.
- If the receiving CTS agency places the former enrollee while the placement window is active, the receiving agency receives credit for the applicable measures; the initial agency does not receive flow-back credit for the placement.
- If both the initial and the receiving CTS agency place the former enrollee while the placement window is active, the initial agency receives credit for the applicable measures and the receiving agency is credited only if that placement is an upgrade, according to the criteria defined in the placement upgrade chart attached to Appendices 501a, 501c, and 501d. (In this case, the credit would only be counted once in national totals, but could possibly be counted twice in the regional totals if two different regions were involved in the transfer.)

(b) Graduates. For graduates initially assigned to one CTS agency who relocate to a new address covered by a different CTS provider, credit is

applied as follows:

(1) Graduates – Short-Term Placement Measures:

- If the initial CTS agency places the relocating graduate prior to the time of transfer, the initial provider is the agency of record for the short-term placement measures (Post-Enrollment Placement Rate, JTM/PSC Placement Rate, Graduate Placement Rate, and Graduate Average Wage at Placement).
- If the graduate is placed by the initial CTS agency, is transferred with **60 or more calendar days** remaining in the placement services window, and is then placed by the receiving CTS provider, the receiving agency is credited only if that placement is an upgrade, according to the criteria defined in the placement upgrade chart attached to Appendices 501a, 501c, and 501d. (In this case, the credit would only be counted once in national totals, but could possibly be counted twice in the regional totals if two different regions were involved in the transfer.)
- If the initial CTS agency does not place the relocating graduate prior to the time of transfer, and there are **60 or more calendar days** remaining in the placement services window, then the receiving agency is accountable for the short-term placement measures (Post-Enrollment Placement Rate, JTM/PSC Placement Rate, Graduate Placement Rate, and Graduate Average Wage at Placement).
- If neither the initial nor the receiving CTS agency places the relocating graduate, and there were **less than 60 calendar days** remaining in the placement services window at the time of re-assignment, then the initial agency is accountable for the short-term placement measures (Post-Enrollment Placement Rate, JTM/PSC Placement Rate, Graduate Placement Rate, and Graduate Average Wage at Placement).

- If the initial CTS agency does not place a relocating graduate prior to transfer, and there were **less than 60 calendar days** remaining in the placement services window at the time of re-assignment, and the receiving CTS provider places the graduate during the placement window, then the initial agency is not accountable for the short-term placement measures and the receiving agency receives the credit for these measures (Post-Enrollment Placement Rate, JTM/PSC Placement Rate, Graduate Placement Rate, and Graduate Average Wage at Placement).

(2) **Graduates — Long-Term Placement Measures:**

- If the graduate relocates to a new address covered by a different CTS provider with **60 or more calendar days** remaining in their placement window, the receiving agency is then accountable for all 6- and 12-month follow-up placement and earnings measures, unless the student relocates and is transferred again to another agency. In this case, the rules described for the short term placement measures would apply.
- If the student relocates and is transferred **within 16 weeks** from the date the student initially reported to work or school, the receiving CTS agency is credited for the 6-month survey results (Graduate 6-Month Follow-Up Placement and Graduate 6-Month Follow-Up Earnings). If there is no further transfer, the receiving CTS agency is also responsible for the Graduate 12-Month Follow-Up Placement measure.
- If the student relocates and is transferred **after 16 weeks** from the date the student initially reported to work or school, the CTS agency responsible for the student at the time of the relocation is accountable for the 6-month survey results (Graduate 6-Month Follow-Up Placement and Graduate 6-Month Follow-Up Earnings). If there is no

further transfer, the receiving CTS agency is responsible for the Graduate 12-Month Follow-Up Placement measure.

- If the student relocates and is transferred **within 42 weeks** from the date the student initially reported to work or school, the receiving CTS agency is credited for the 12-month survey results (Graduate 12-Month Follow-Up Placement).
- If the student relocates and is transferred **after 42 weeks** from the date the student initially reported to work or school, the CTS agency responsible for the student at the time of the relocation is accountable for the 12-month survey results (Graduate 12-Month Follow-Up Placement).

- (c) **Multiple Transfers.** If the student transfers from one CTS provider area to another multiple times during the student’s active placement window, the rules described above still apply in the same sequence.

Example: If CTS agency “A” places a student during the placement window, it will receive the credits for the short-term placement measures. If the student then changes CTS providers multiple times (e.g., A→B→C, or, A→B→A) within the approved timeframe (more than 60 days remaining in the service window for short-term placement measures, within 16 weeks or within 42 weeks from the date the student initially reported to work or school for the 6-month and 12-month measures respectively), the last assigned agency is responsible for all applicable measures. Rules concerning approved timeframes and upgrades apply to subsequent CTS agencies. If the re-assignment did not occur during the approved timeframe, then the previous CTS agency of record for all applicable measures is still responsible.

(Center, CTS, and CTT Report Cards)

7. **Timelines for Reporting Placement Data.** As per the revision in PRH Chapter 4.5, the timelines surrounding reporting, verifying and entering placement data are modified slightly to allow CTS providers more flexibility regarding when a verification of a placement is received and entered into CIS. The timelines are as follows:

- (a) **Date Reported:** This is the date the student first enters a placement

during their initial placement window, regardless of whether they meet Job Corps' placement definition, and regardless of when the CTS provider first learns of the student's placement.

Exceptions to the "date reported" policy are currently allowed in the following circumstances:

- If the student enters a placement prior to their separation date, the "date reported" must be recorded as the date following the separation date.
- If the student transfers from one CTS provider to another, the "date reported" cannot be earlier than the transfer date; therefore, if the student is placed prior to the transfer date, the "date reported" must be recorded as the date of transfer.

(b) Date Placed: This is the date the student meets the Job Corps definition for placement, and must be at least 7 calendar days after the date reported in order to ensure that the placement criteria have been met.

(c) Date Verified: This is the date that documentation is received verifying the placement (including the hours, duration, and/or wage as appropriate).

Note: In order to be considered a valid placement, the placement verification must be received and reported to the Data Center via the CTS system within 90 days of date placed.

Note: If the placement is not considered valid because the verification is not received and the information entered into CTS within the above-specified timeframe, the CTS provider will not receive the initial placement credit for this student. However, if the student is a graduate, and responds to the follow-up surveys, the CTS agency may receive 6-month and 12-month placement credits.

(CTS Report Card)

- 8. Placement Upgrades.** Placement upgrades occurring while the student's initial placement window is active will continue to be credited in PY 2009. As in prior years, placement upgrades that occur during the placement window are credited for the short-term CTS measures (Job Training Match [JTM]/Post-Secondary Credit [PSC] Placement, Post-Enrollment Placement, Graduate Placement, and Graduate Placement Wage). All students (graduates and former enrollees) are eligible for upgrades that occur while their placement window is active.

Example: A graduate separates from a center and is initially reported placed in a \$7.50 per hour, non-JTM job. Credit for that student is given for the Post-Enrollment Placement Rate, Graduate Placement Rate, and Graduate Placement Wage (at \$7.50 per hour) in the Center Report Card. During the placement window, the graduate obtains another full-time position that is a JTM and has an hourly wage of \$8.00; a placement record for this job should be submitted since the wage increase occurred. Upon submission, the higher wage and job information replaces the lower, thereby “upgrading” the result for the student. That is, credit for the Post-Enrollment Placement Rate, Graduate Placement Rate, and Graduate Placement Wage is replaced by the \$8.00 per hour job, and credit is now also given for the JTM/PSC Placement Rate.

Note: All subsequent placements that occur after the initial placement, yet during the placement window, should be recorded in CDSS for informational purposes, regardless of whether the placement is an upgrade. However, only those placements that are upgrades are credited for the short-term CTS measures. A chart outlining the placement upgrade hierarchy is attached to Appendices 501a, 501c, and 501d. Upgrades are credited to align the systems with the CTTRC, emphasize the importance of continuous progress in the workforce, and encourage JTM and PSC placements.

(Center, CTS, and CTT Report Cards)

- 9. Filing a Request to Add a Job Title to the JTM Crosswalk.** The process created in PY 2007 for requesting that a job title be added to the Job-Training Match (JTM) Crosswalk will continue to be available for PY 2009. However, a request should be submitted only if the current JTM Crosswalk does not contain an appropriate job title that is directly related to one of the new Training Achievement Records (TAR), released in PY 2006 or thereafter. If the request is approved, the new job title will be added to the placement portion of the JTM crosswalk, and JTM placement credit will be given as appropriate to those students who complete the identified TAR and are placed, as of July 1, 2007, in a position with the approved job title. Please ensure that requests are filed using the PY 2009 version of the Request form located in Appendices 501a, 501c, and 501d.

(Center, CTS, and CTT Report Cards)

- 10. Minimum Productivity Rule (MPR).** The Minimum Productivity Rule (MPR) is a measure of efficiency that attempts to ensure a reasonably high rate of placements is produced relative to the investment made in space, teachers,

equipment and other resources on a center for a given number of contracted slots.

The MPR requires all CTT programs to place (CTT completers only) a minimum of 51% of their contracted training slots every program year.

While the MPR is a useful indicator of efficiency for each CTT program, the MPR was temporarily suspended for PY 2007 to allow for centers to transition to using new, more rigorous guidelines and completion requirements for their CTT programs that align them with nationally recognized industry standards and certification requirements. Centers were required to complete the transition to the new and revised CTT programs by June 30, 2008. These higher standards are expected to affect the length of time needed to complete the program, which in turn may potentially impact attrition rates, reducing the number of potential placements, and increasing the chances of these programs falling below the MPR threshold. **Therefore, the MPR will continue to be suspended for PY 2009,** so that consideration may be given to how the MPR is being impacted and what type of accommodations will need to be made due to the increased CTT program requirements. It is anticipated that the MPR will be restored in PY 2010.

(CTT Report Card)

11. **Military Wage at Placement.** The Office of Job Corps uses a standardized hourly military wage rate of \$11.14 to record the salary of Job Corps students entering the military. This figure reflects the basic salary of an E-1 enlistment and the estimated value of several additional non-wage benefits, such as government quarters value, basic allowance, and clothing allowance. The wages reported for students placed in civilian positions do not include any benefits that they may be receiving from their employer, such as free or subsidized medical coverage, subsidized transportation, retirement savings contributions, stock options, and so forth. It is possible for a Job Corps student who enters the military to have a higher base pay than that used to calculate the \$11.14 per hour rate; however, since the current standardized military rate that Job Corps uses includes the value of benefits received, and similar benefits are not accounted for in the civilians' salaries, it is the policy to not increase the recorded military wage at this time.

(Center, CTS, and CTT Report Cards)

12. **6-Month and 12-Month Follow-Up Survey.**

- (a) **Data Validity.** Job Corps is committed to the highest standards of data

validity and integrity for all data collected and used in the performance management systems. In particular, this applies to all information obtained from students through the 6- and 12-month post-placement surveys. To ensure the validity and integrity of these data, it is important that all Job Corps staff recognize the policies and procedures that need to be followed when collecting data from human subjects. Provided below is background on information provided to students when the surveys are administered, followed by examples of behaviors that potentially threaten the validity and integrity of the data.

All research conducted with human subjects must abide by guidelines ensuring that the rights of participants are protected. The Office of Job Corps and the survey research contractors are committed to the ethical conduct of the follow-up survey data collection. This includes providing participants with information about the survey and their rights as participants so that they can make an informed decision about whether to participate. The survey is voluntary, which means that participants have the right to refuse to participate and must not be subject to coercion or otherwise made to feel that a benefit of the program will be denied them if they do not participate.

- (b) **Survey Protocol.** Before beginning the questionnaire, survey staff read each participant a statement of “informed consent” that includes the following guidelines and principles:
- Their participation in the survey is voluntary;
 - They have the right to refuse to participate in the survey or to refuse to answer any questions they do not wish to answer;
 - Their refusal to participate in the survey will not impact any benefit they are eligible to receive as participants in the Job Corps program; and,
 - The information they provide will be confidential and will only be used by Job Corps for purposes of program evaluation.
- (c) **Prohibited Activities.** To ensure that participation in Job Corps’ follow-up survey remains voluntary and that Job Corps program staff do not engage in any practice that might be construed as coercion, the following

practices should be avoided when Job Corps staff discuss the survey with former students:

- It is inappropriate to link the receipt of any payments, awards, or benefits that Job Corps students are otherwise eligible to receive for their program participation to the conduct or result of the survey. Whether the student completes the survey and whether answers result in a positive credit for the program, center, or CTS agency, should never be used to give or deny students any payments, awards or benefits for which they are otherwise eligible.
- Instructing students that they should not participate in the survey unless they are employed or in school is inappropriate and would lead to invalid measures of program performance.
- Coaching students on their responses, such as by providing or suggesting “correct” or “incorrect” answers to questions is inappropriate.
- Listening in on the telephone while the student takes a confidential survey is inappropriate. If former students call the survey line from a counselor’s office, the counselor should leave the room so that the participant can answer the survey in private.
- Requesting students whose responses to the survey resulted in zero credit to call the survey line and take the survey over again is inappropriate. Moreover, if a student has already completed the survey, the survey contractor will not administer a second survey.

Note: If a student’s survey resulted in no credit and the center or CTS agency believes the student was in a qualified placement, the appropriate step is to file an appeal (attached to Appendices 501a, 501c; and 501d).

- Withholding known contact information for students who do not currently have a Job Corps-valid job or school placement is inappropriate and will lead to invalid outcome measures.

The Office of Job Corps actively responds to violations of this policy. Consequences for unethical or fraudulent contact would include:

- Dismissal of the responsible contractor staff;

- Invalidation of any credits received for the 6-month and/or 12-month follow-up surveys (as applicable) in the Center, CTS and Career Technical Training Report Cards;
- Administrative movement of the contractor to the bottom of the Report Cards, affecting their performance and incentive bonus as well as their internal scores for earning future contracts; and/or,
- Cancellation of the contract.

Note: These or similar repercussions may be imposed when such behavior is identified.

- (d) **Appeal Process.** The Office of Job Corps has developed an appeals procedure for the 6- and 12-month follow-up placement and earnings measures. Appeals of these outcomes can be made by the center from which the student separated, the CTS agency to which the student was assigned, or the NTC contractor responsible for post-program services. The appeal must be filed within 90 days of the month in which the student's record first appears on the reports for individual student outcomes (OMS-20, CTT-20, or CTS-20).

The appeals process requires that an appeal form be completed along with supporting documentation (i.e., pay stub, written statement on letterhead, business card or office stamp on center or CTS verification form, school/training institution transcript, or The Work Number *only if* the documentation details the student's employment information in such a way as to meet Job Corps' placement requirements *and if* accompanied by the student's pay stub) that corresponds to the student's applicable survey week. The appeal form and the documentation are to be sent to:

US Department of Labor/ Office of Job Corps
200 Constitution Avenue, NW
Washington, DC 20210
Attention: Program Performance Team

The Office of Job Corps will review the appeal form and supporting documentation, and reach a decision on whether or not to grant credit for the 6- and/or 12-month follow-up placement and earnings measures. The decision will be recorded and forwarded to the appealing entity within 30

days of receipt. Outcomes of this appeal will then be incorporated in subsequent performance reports. Please ensure that appeals are filed using the PY 2009 version of the Appeals form located in Appendices 501a, 501c, and 501d.

(Center, CTS, and CTT Report Cards)

F. Major Changes for PY 2009. Provided below are the major changes that affect the outcome measurement systems. Specific changes to individual systems are contained in each system's section, which follows this Introduction.

- 1. Graduate Placement Window.** In PY 2005, the window for graduate placement was reduced from 12 months to 6 months to both ease CTS providers' caseloads and accelerate the basis for follow-up services. In light of current economic conditions, in particular the rise in the unemployment rate over the past 2 years and the negative new job growth rate, the National Director has approved extending the graduate placement window by 3 months, to a total of 9 months, for all graduates who separate from Job Corps as of October 1, 2009 or later. Graduates will continue to receive career transition services for 12 months after their initial placement as mandated by WIA. Therefore, the maximum length of time a graduate will receive services is 21 months. This modification in the service time frame will allow CTS providers additional time to place graduates under these more challenging labor market conditions, and it is anticipated that this change will positively impact the graduate population. *(Center, CTS, and Vocational Training Report Cards)*

Note: Graduates who have separated from the program prior to October 1, 2009 will continue to receive up to 6 months of placement services, and 12 months of transition services, for a maximum service period of 18 months. The service period for former enrollees remains unchanged (up to 3 months). *(Center, CTS, and Vocational Training Report Cards)*

G. Data Integrity. Job Corps' performance management system is comprehensive and complex, and has received high praise from both OMB and other employment and training programs. It is the basis not only for Job Corps' national performance reporting, but also for continuous program improvement and performance-based contracting. In order to maintain the highest level of data reliability and validity in our collection and reporting processes, the Office of Job Corps will continue to focus on data integrity issues related to the performance management system. As a *system*, each level of staff is responsible for the integrity of the data they generate, collect, or record. All OA

providers, center operators, academic/CTT providers, and CTS contractors should continually strive to provide complete information, proper documentation and accurate data input into the CIS. Regional Offices will continue to conduct rigorous onsite data integrity audits using targeted samples and the National Office will remain vigilant and responsive to all data integrity issues.

Following are Appendices 501a, 501b, 501c, and 501d, which provide specific information on the individual outcome measurement systems for PY 2009.