SUBJECT: TAACCCT Round 4 Single-State Consortium Grantees; Employment Results Scorecard

June 16, 2016

Dear TAACCCT Round 4 Grantees with Single-State Consortiums:

This communication concerns the Trade Adjustment Assistance Community College and Career Training (TAACCCT) Solicitations for Grant Applications SGA/DFA-PY-13-10 (awarded in September of 2014; “TAACCCT Round 4”).

ETA is changing the Employment Results Scorecard requirement for Round 4 single-state consortium grantees, except for the Round 4 grantees who received “cap-breaker” funds to implement innovations related to data integration. For all other Round 4 single-state consortiums, instead of requiring grantees to develop and implement an Employment Results Scorecard within the period of performance, ETA is giving these grantees the option to submit an Employment Results Scorecard Continuous Improvement Plan.

Some key aspects are summarized here, with more detailed information following.

- This option applies to TAACCCT Round 4 single-state consortium grantees. It does not apply to Round 4 grantees who received “cap-breaker” funds to implement innovations related to data integration. It does not apply to regional multi-state consortiums, which were required to submit an Employment Results Scorecard Continuous Improvement Plan as a pre-condition of their applications. It does not apply to single-institution grantees.
- If single-state consortium grantees choose to go with this option, their required deliverable will be an Employment Results Scorecard Continuous Improvement Plan as described in the Round 4 SGA.
- Either the scorecard implementation (original requirement) or the continuous improvement plan (revised requirement) is due at the end of the Round 4 period of performance, September 30, 2018. Development of either deliverable is not considered grant-funded program activity so grant funds may be used for this purpose during the last six months of the grant.
- This change is optional; grantees should let their FPO know in the next QNPR (due August 15, 2016) how they wish to proceed. Choosing the plan option may lead to a budget modification; if so, grantees should discuss with their FPOs.

BACKGROUND

The reasons for this change include:

- In many cases, the necessary wage-record data has proven too difficult to access reliably or timely.
- TAACCCT scorecards are unlikely to align to the future Federal scorecard system envisioned by the Workforce Innovation and Opportunity Act (WIOA).
- The WIOA scorecard may supplant whatever TAACCCT grantees develop.
• Having different scorecard initiatives is not effective, and WIOA scorecards have broader implication and impact.

As such, ETA recognizes that the operational and legislative environments do not align with the original intent of the scorecard requirement of the SGA. Pages 38-39 of the SGA, which outline the scorecard requirements read, in part:

10. Employment Results Scorecard (for Single-State Consortium Applicants)

Single-state consortium applicants are required to provide a plan to develop and implement an employment results scorecard during the grant performance period. The purpose of the employment results scorecard is to help TAA-eligible workers, other adult learners, and prospective students identify and choose programs by providing key information on the employment outcomes of graduates of these programs of study to determine whether these programs of study may be appropriate for their career goals. The same data on aggregate student outcomes by programs of study will help institutions improve their programming by ensuring that course offerings are aligned with labor market needs. In addition, in developing a scorecard, institutions begin to establish a sustainable system for tracking and reporting outcomes and using data for continuous improvement that extends beyond the period of performance of grant program.

Single-State Consortium applicants must submit a clearly labeled Employment Results Scorecard Workplan as an Attachment to the Project Narrative that addresses the four items below and describes a plan to implement this scorecard by the end of the grant period of performance.

a. Performance Metrics of the Scorecard

Applicants must propose and describe the performance metrics used in the employment results scorecard. The Department recognizes that state laws and regulations differ and may sometimes affect the availability of data in the states in which consortium applicants propose to serve participants. The Department also recognizes that many applicants already have a mechanism in place for collecting and sharing this data or are participating in other initiatives to create similar reports. As a result, the Department encourages applicants to propose metrics that complement and relate to existing reporting practices, such as student repayment rates or other institutional evaluation studies over varying lengths of time. Although the set of metrics proposed must include the five items listed below, the Department encourages applicants to propose metrics in addition to those listed below, where appropriate, and the appropriate length of time of measurement. Applicants should note that while the metrics below are similar to grantee reporting requirements as described in Section IV.C, these metrics are not intended to be a substitute for meeting those reporting requirements.

(1) Annual graduation rate for all students enrolled by program;
(2) Employment rate of program completers by program;
(3) Employment retention rate of completers;
(4) Average earnings of completers; and
(5) Transfer rate for programs that have facilitating transfers as a substantial part of their mission...

NEW OPTION
Instead of requiring single-state consortium grantees to develop and implement scorecards as described, in part, above, ETA will allow Round 4 grantees (with the “cap-breaker” exception noted above) to instead submit an Employment Results Scorecard Continuous Improvement Plan as described in the SGA. Pages 40-41 of the SGA, which outline the plan requirements read, in part:

**11. Employment Results Scorecards Continuous Improvement Plan (for Regional Multi-State Consortium Applicants)**

Multi-state consortia are required to submit a plan that explains how consortium members will work toward developing an employment results scorecard. The Department recognizes the extra challenges of understanding and applying state laws across the various states to obtain and report data on employment outcomes. However, the Department believes that establishing a system to report on student outcomes, such as the employment results scorecard, will benefit TAA-eligible workers and other adult learners in the various states served by the consortium.

To meet this requirement, multi-state consortium applicants must submit a clearly labeled Employment Results Scorecard Continuous Improvement Workplan as an attachment to the Project Narrative that addresses the items below.

a. **Survey of Data Systems**

   Applicants should provide brief results of a survey of the data systems in each state served by the grant. This survey should include, at a minimum, information about the agency responsible for administering the UC programs or employment data for each state; existing practices applicants use to collect data on student outcomes; and a summary of regulations and other barriers to sharing aggregate data publically. Applicants should also explore the possibility of aligning or joining an existing longitudinal data study or other existing data sharing initiatives in the various states served by the consortium.

b. **Options for Obtaining and Sharing Data**

   Applicants should provide a discussion of options for obtaining data on student outcomes in all states served by all consortium members. This discussion should also include feasibility study for implementation of student consent protocols across each consortium institution, likelihood and costs for obtaining data from the state agency that administers unemployment insurance, and potential for participation in longitudinal data studies, as applicable.

c. **Plan to Use Data for Continuous Improvement**

   Applicants should also discuss plans using an employment outcomes scorecard or other data analytics that will help consortium members monitor program performance at their institutions, improve current program offerings, and provide new programs that will provide students the skills necessary to obtain employment.

d. **Estimated Costs**

   Applicants should provide an estimate of the costs of implementing the continuous improvement plan across all consortium members.

Please note that if your eligible single-state consortium determines that it is in the best interest of the grant to continue with implementation of the Employment Results Scorecard, you may continue to use grant funds, as budgeted, for this activity throughout the period of performance (i.e., through September 30,
2018 for Round 4). You should continue providing your FPO updates on your progress toward implementation through your quarterly reports.

If the single state consortium instead chooses to submit an Employment Results Scorecard Continuous Improvement Plan as described above, you must provide an update to that effect in your next quarterly report. In addition, grantees choosing this approach should examine their budget to determine if a budget modification is needed and if so, submit one through the usual process after discussion with their FPO. Consistent with the original deadline for scorecard implementation, the due date for the Employment Results Scorecard Continuous Improvement Plan is the end of the grant period of performance (September 30, 2018 for Round 4). Grantees may use a portion of the grant funds previously allocated to the scorecard implementation to develop the Continuous Improvement Plan, and use those funds for this purpose through the entire period of performance.

The Round 4 grantees who received additional “cap-breaker” funds to implement innovations related to data integration are not included in this policy change; those grantees must develop and implement their Employment Results Scorecards as per the SGA and their Statements of Work.

Should you have any questions about this letter, please consult with your FPO.

Sincerely,

Eric Luetkenhaus
Grant Officer
Division of Federal Assistance for Discretionary Programs