ADVISORY: TRAINING AND EMPLOYMENT GUIDANCE LETTER NO. 33-11

TO: STATE WORKFORCE AGENCIES
    STATE WORKFORCE ADMINISTRATORS
    STATE WORKFORCE LIAISONS
    STATE AND LOCAL WORKFORCE BOARD CHAIRS AND DIRECTORS
    ONE STOP CAREER CENTER MANAGERS
    STATE VETERANS EMPLOYMENT AND TRAINING DIRECTORS
    WIA SECTION 166 GRANTEES
    ETA REGIONAL ADMINISTRATORS

FROM: JANE OATES /s/
      Assistant Secretary

SUBJECT: Annual Program Guidance for the Program Year 2012 Workforce Investment Act (WIA) Adult, Dislocated Worker, and Wagner-Peyser programs

1. **Purpose.** The purpose of this Training and Employment Guidance Letter (TEGL) is to:
   - Communicate the Employment and Training Administration’s (ETA) program and policy priorities for the formula-funded Workforce Investment Act (WIA) Adult, Dislocated Worker and Wagner-Peyser programs in Program Year (PY) 2012.
   - Share resources, tools, and strategies the workforce system can use to support the implementation of these program and policy priorities.
   - Provide technical assistance and support to states and local areas in the development of 2012 State Workforce Plans as required by TEGL 21-11, “Requirements for 2012 State Workforce Plans.”

2. **References.**
   - Workforce Investment Act of 1998 (WIA), as amended (29 US Code 2801 et seq.)
   - TEGL No. 15-10, “Increasing Credential, Degree, and Certificate Attainment by Participants of the Public Workforce System”
   - TEGL No. 02-07, “Leveraging Registered Apprenticeship as a Workforce Development Strategy for the Workforce Investment System”
   - TEGL No. 21-11, “Requirements for 2012 State Workforce Plans”

RESCISSIONS
None

EXPIRATION DATE
Continuing
3. **Background.** Even as the economy recovers from the recession and job growth returns, there is still work to be done to help jobseekers return to work, help employers gain access to the skilled workers they need to compete globally, and meet the needs of vulnerable populations who need assistance connecting to the labor market. According to the Bureau of Labor Statistics (BLS), the national unemployment rate, as of April 2012, has declined to 8.1 percent for the overall population. Yet more than six million workers have been unemployed for 27 weeks or more, and of those, 4.5 million have been unemployed for a year or more. While economic conditions have impacted a range of adult workers, vulnerable populations such as veterans and eligible spouses, military spouses, adults with disabilities, ex-offenders, immigrants, low-skilled dislocated workers, older workers, and public assistance recipients have been disproportionately affected by the economic downturn and lengthy periods of unemployment.

Minorities too have experienced challenges in returning to work. The unemployment rate for African Americans stands at 13 percent, substantially higher than the national rate, while the rate for Hispanics is 10.3 percent. While providing employment and training services to help these populations find good jobs, the workforce investment system is also being called on to help highly-skilled professionals who are, in many cases, dealing with significant unemployment for the first time in their careers due to downsizing and layoffs in the business community.

As the workforce system connects jobseekers to jobs, it faces the additional challenge of meeting employer demand for skilled labor, which is projected to grow significantly over the next decade. Many jobs are now requiring a higher level of education and credential attainment at a time when over five million unemployed adults in the United States lack a postsecondary degree or certificate. This challenge is further complicated as Federal funding for the workforce system has become constrained by a rising demand for services, leaving fewer dollars available for training.

Overcoming these challenges will require the public workforce investment system to create new approaches and policies, focus resources, and increase its awareness of how innovation can foster greater efficiencies.

4. **Overview of National Policy and Program Priorities.** The public workforce system is being called upon to be at its most effective and innovative during the current economic climate. Both government and private sector leaders are urging the creation of solutions to reemploy America’s workers and help employers meet workforce shortages. In response, ETA encourages states and local areas to consider the following three national policy and program priorities as they plan for and execute the PY 2012 WIA Adult and Dislocated Worker and Wagner-Peyser programs:

• **Improving the effectiveness of workforce programs** through increased interagency coordination and cross-program alignment, enhanced services offered through the nation’s One-Stop Career Centers, and the strategic use of labor market information and evidence-based practices by the nation’s workforce leaders and boards;

• **Enhancing jobseeker competitiveness** through a focus on increased credential attainment that results in raised earnings and employment outcomes for public workforce system participants and skilled workers for the nation’s employers; and

• **Promoting a dual customer focus** that aligns ETA’s employment and training investments in jobseekers with the workforce needs of employers.

ETA believes that the policy priorities and proposed strategies outlined in this TEGL will help public workforce system leaders focus state and local planning efforts and budgeting priorities throughout the 2012 State Workforce Plan development process. Further, it is expected that the resources referenced in this guidance letter will be used in program implementation, where applicable. Together, ETA and its state, local, and tribal workforce system agency partners can help the public workforce system meet the challenges of today’s economy and continue to gain ground in helping Americans get good jobs, earn family-sustaining wages, and move up a chosen career ladder.

5. **Improving the Effectiveness of Workforce Programs.** At a time of constrained resources, including a recent reduction in statewide reserve funding, states and local areas should allocate funds to workforce programs and practices that can ultimately achieve measurable and improved outcomes for the public workforce investment system and its dual customers – jobseekers and employers. These budgetary constraints will continue to spur Federal, state, and local workforce investment system agency partners to identify new ways to improve service delivery and cost-effectiveness as well as enhance collaborative efforts.

Working in tandem, states and local areas can consider implementing the following key strategies for making the public workforce system and its services more effective:

**A. Streamline Administrative Processes to Maximize Program Efficiency**

Building an effective public workforce system requires leadership at both the state and local levels. Workforce Investment Boards (WIBs) can work at a “system” level to facilitate shared planning across agencies, leverage the financial resources of multiple agencies and programs, and create shared performance management systems. Workforce partnerships at local and regional levels can, at the point of service delivery, integrate education, training, and other support services where job seekers and employers access them.

- **Simplify processes for intake, application, and case management.** Many state and local areas are adopting integrated intake processes and case management to reduce the practice of requiring customers to provide their basic information multiple times and to support streamlined eligibility determination and service
provision. For example, Missouri’s Next Generation Career Center initiative integrates service delivery for customers across a variety of workforce programs, including Trade Adjustment Assistance (TAA), WIA, and Wagner-Peyser programs. In addition, many states have streamlined the intake and eligibility process for first-time customers, placing them on a fast track for service.

- **Promote data sharing and integrated reporting across workforce programs.** States such as Pennsylvania and Texas have adopted integrated reporting across WIA, Wagner-Peyser and Trade Adjustment Assistance programs. This approach to reporting reduces duplicate record keeping by allowing grantees administering multiple workforce programs to utilize a single set of formats to report on jobseeker and employer interaction with the workforce investment system. States and local areas can view a sample integrated report layout at the Web site: [http://www.doleta.gov/Performance/guidance/wia/Appendix_D_WISRD_Specifications.xls](http://www.doleta.gov/Performance/guidance/wia/Appendix_D_WISRD_Specifications.xls). Additionally, other states have developed cross-agency Memoranda of Understanding and procedures that allow them to better share data across education and job training programs. These approaches remove some of the administrative hurdles that prevent better program cooperation and communication.

- **Explore and request waivers that advance more integrated implementation of state workforce strategies.** To support state and local efforts that improve service delivery, ETA will consider offering administrative flexibility under its waiver authority (WIA Section 189(i)(4)) in addition to changes adopted in the 2012 State Plan requirements. Information regarding waivers can be reviewed at [http://www.doleta.gov/waivers](http://www.doleta.gov/waivers).

**B. Increase Interagency Coordination and Cross-Program Alignment**

Collaborative partnerships with education, social and human services, economic development, and employers are critical in the creation of a workforce system that helps unemployed and underemployed workers enter and advance in the job market. Increased alignment among agency partners can provide easier access to all workforce programs at any point of entry into the system. This “no wrong door” approach can ensure the most effective leveraging of funding and expand participant access to integrated services.

A specific benefit of such heightened integration efforts is a service delivery system that more fully connects jobseekers to work supports. Research evidence shows that work supports - which include child care subsidies, public health insurance, the Earned Income Tax Credit, food stamps, transportation subsidies, and other related programs - can substantially boost income and improve family well-being, both while low-wage workers are employed and during extended periods of unemployment.\(^3\) State and local workforce investment areas have an important role to play in helping the unemployed

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access these work supports. For example, states can apply for “Gap Filler” Health Coverage Tax Credit (HCTC) National Emergency Grants (NEG) to help TAA-eligible dislocated workers and other eligible individuals pay up to 72.5% of their qualified health insurance premiums until they are enrolled in the Internal Revenue Service’s (IRS) HCTC program and receive the appropriate IRS tax credit.

ETA encourages state and local WIBs to review current service delivery strategies and, where possible, work with their partners to:

- **Improve joint strategic and unified planning processes across multiple agencies** that capitalize on the resources and strengths of each agency partner and support economic recovery goals. For example, Massachusetts’ Departments of Labor, Education, and Housing and Economic Development jointly developed a state-level strategic plan in 2011 to achieve the state’s workforce development goals in four key sectors – health care, life sciences, information technology, and advanced manufacturing. One of the primary goals of the joint plan was to better align existing educational and workforce training programs and resources across the state with clearly defined industry-specific pathways to employment.

- **Improve the connection between the WIA, Wagner -Peyser and Unemployment Insurance (UI) systems.** To shorten the duration of unemployment for UI claimants and to enhance reemployment services for all unemployed job seekers, ETA and state and local workforce agencies are collaborating to implement new and innovative reemployment strategies. This collaboration envisions four significant transformational changes to the current UI and workforce system processes: 1) integrated customer registration to create a "no wrong door" point of entry for a combined system; 2) real-time triage to ensure initial and continuing customer assessment to focus services and benefits; 3) real-time job matching and labor market information; and 4) use of the Internet and social media channels. More information can be found in the “Unemployment Insurance and Workforce System Connectivity Workgroup Final Report” at [https://www.workforce3one.org/view/4011107031158575200/info](https://www.workforce3one.org/view/4011107031158575200/info).

- **Develop a support service network for struggling jobseekers.** The network should include representatives from Temporary Assistance to Needy Families (TANF) and Housing and Urban Development (HUD) agencies, adult basic education providers, and community-based organizations. Access to job clubs, childcare, transportation, mental health counseling, housing information, and financial aid information can better ensure educational success and job retention outcomes for adults and dislocated workers.

- **Pilot the use of innovative financing models through leveraged public and private partnership funding or blended federal and state funding to enhance training programs.** Minnesota’s successful FastTRAC (Training, Resources, and Credentialing) career pathways initiative is supported by a variety of funding
partners, including federal, state, and private foundation support. More information about FastTRAC can be viewed at [http://mnfasttrac.org/partners.html](http://mnfasttrac.org/partners.html).

- Increase the number of training programs that integrate academic and occupational skills, thereby generating sustained improvements in the performance of the public workforce system, both in terms of cost-effectiveness and outcomes for jobseeker and employer customers. Examples such as career pathways and learn-and-earn models are covered in more detail in Section 6 of this TEGL.

**C. Deliver Enhanced Workforce Services through One-Stop Career Centers**

In an effort to serve greater numbers of customers, many states and local workforce areas are working to augment the quality of core and intensive services available to jobseekers and employers. States and local areas should work to ensure the maximum coordination among ETA programs and services to help unemployed adults, dislocated workers, (including those who are served through NEGs) and underemployed adults. ETA encourages state and local workforce agencies to adopt practices that deliver high-quality services to help customers enter and retain good jobs and increase workforce program effectiveness, such as:

- **Use the latest online career development tools such as mySkills myFuture and MyNextMove in the provision of core and intensive services.** The ETA-produced CareerOneStop Web sites have tasks, skills, and salary information for over 900 different careers. The career exploration tool, My Next Move, is built on O*NET and includes the O*NET Interest Profiler, which offers personalized career suggestions based on a person’s interests and level of work experience. The mySkills myFuture Web site is a skills transferability tool that allows jobseekers to learn more about their career options. The customized My Next Move Web site for veterans allows them to enter their military occupational code and discover civilian jobs that require similar skills.

- **Invest in professional development opportunities that build the capacity of One-Stop Career Center staff to help customers create individualized career plans and define career pathways.**

- **Ensure that WIA and Wagner-Peyser core and intensive services are informed by up-to-date labor market information that is customized for both jobseekers and businesses.** Staff can use resources such as the Labor Market Information Center at [http://www.careeronestop.org/lmi/LMIHome.asp](http://www.careeronestop.org/lmi/LMIHome.asp), which provides detailed labor market data to help each customer research current employment trends and identify fast growing occupations in a state or local area.

- **Pilot new case management strategies that improve career planning services and increase retention** by using social media tools and the Effective Case Management Resource Map. Social media tools like Facebook, Twitter, and LinkedIn can be
used to reach out to jobseekers and keep them updated about job openings, career fairs, and workshops. The Resource Map, developed by ETA in 2010, includes over 100 resources and identifies key activities and competencies for front-line staff. It also provides detailed examples of state and local workforce system efforts to improve career planning. The Map can be viewed at https://www.workforce3one.org/view/2001107448386281282/info.

- Fully integrate newly designed strategies to serve vulnerable populations, including veterans and eligible spouses, military spouses and disabled adults, into the provision of core and intensive services. For example, to aid veterans in reemployment and career transition efforts, ETA and the Veterans’ Employment and Training Services (VETS) launched the Gold Card initiative. The Gold Card provides unemployed post-9/11 era veterans with enhanced intensive and follow-up services. More information on the Gold Card can be found at http://www.dol.gov/vets/goldcard.html. Additionally, the Disability and Employment Community of Practice at http://disability.workforce3one.org provides a wide range of promising practices, successful strategies and model service delivery examples to help states and local areas improve employment outcomes for youth and adults with disabilities.

- Develop and continuously improve Rapid Response teams and practitioners to ensure that affected workers return to work as quickly as possible following a layoff, or prevent layoffs altogether. TEN 31-11, “The Rapid Response Framework,” shares key global attributes of a successful Rapid Response system, and ensures that all state and local leaders understand the full array of strategies and activities that can be carried out by Rapid Response units. TEN 32-11 announces the availability of a revised Rapid Response Self-Assessment Tool that allows states to examine various elements of their Rapid Response systems, assess performance, take an inventory of Rapid Response service delivery, and identify areas for self-improvement.

- Assess prior learning experiences to help adults and dislocated workers obtain academic credit for independently attained knowledge and skills, thereby accelerating the process for credential attainment. Prior learning experiences might include on-the-job training, volunteerism, military service, and self-study courses. More information on prior learning assessment can be viewed in the ETA webinar, “New Strategies to Increase Credential Attainment” at https://www.workforce3one.org/view/5001130749311694434/info.

- Explore the use of virtual points of access and alternative service locations, such as libraries or community centers, mobile van units or kiosks, to provide cost-effective workforce services to customers in remote or rural areas.

D. Build the Capacity of Workforce Leaders to Create Effective Workforce Strategies
State and local workforce investment board (WIB) members, state- and local-level board
staff, and other cross-sector agency leaders are charged with creating strategic workforce solutions for communities and regions. These strategic solutions should take into account the labor market realities and skills needs of a region and incorporate evidence-based practices that have been proven through rigorous evaluation to work.

There is an increasing public awareness of the significant role that state and local workforce boards play in transforming the public workforce system. For example, the Government Accountability Office (GAO) released a report in January 2012 entitled, “Innovative Collaborations between Workforce Boards and Employers Helped Meet Local Needs.” The report positively highlighted the efforts of 14 local workforce boards to effectively meet the needs of multiple employers across industry sectors, such as healthcare and manufacturing. The report also discussed the critical leadership that these boards provided in spurring action and building effective partnerships to meet skills shortages and employer needs in those high-demand industries. Six common factors were cited in the success of these boards: a focus on urgent employer needs; leadership; leveraging resources; employer-responsive services; minimizing administrative burden; and demonstrating results.

ETA recognizes the importance of providing ongoing support to these leaders as they craft strategic solutions to workforce challenges and remain focused on the goals of helping Americans find good jobs and employers remain competitive. To achieve these goals, ETA encourages state and local workforce agencies to:

- Use real-time labor market information and economic development data to build state workforce plans. Workforce leaders should craft strategic workforce plans that reflect a strong understanding of current labor market dynamics; expected growth in regional industry and economic sectors; and the requisite workforce skills needed. As an example, Washington’s state workforce investment board is currently retooling its state workforce plan, High Skills, High Wages to include updated labor market and demographic information and to set new workforce program targets for the next ten years. More information can be found at http://www.wtb.wa.gov/highskills2012.asp.

- Help build the knowledge of state and local workforce boards about the identification and inclusion of evidence-based strategies into strategic planning efforts. Evidence-based practice is the process of systematically finding and using current research findings as the basis for making sound workforce strategy decisions. More information can be found in the online tutorial, “Making the Case for What Works: Using Evidence-Based Practices to Support Innovation” at https://www.workforce3one.org/view/3001135638181284985.

- Provide regular training opportunities for state and local workforce board members to increase their collaboration-building capacity. ETA recently funded the Enhancing Workforce Leadership technical assistance project. The project talked with over 500 workforce leaders across the country and created a “how to”
leadership framework called “WE-dership,” reflecting key qualities system leaders said are needed for effective workforce leadership today. A resource guide, community and industry leadership simulations, and video perspectives on leadership from some of the nation’s top workforce leaders are among the tools that are available at https://enhancingworkforceleadership.workforce3one.org. These tools can easily be integrated into current state and local board member training efforts and can be used to initiate cross-agency discussions designed to tackle challenging workforce problems.

6. **Enhancing Jobseeker Competitiveness.** President Obama has issued the challenge for the United States to lead the world in the percentage of citizens with postsecondary degrees, industry-recognized certificates, and credentials by 2020. In alignment with the President’s ambitious goal, the Secretary of Labor also set a High Priority Performance Goal to increase the percentage of participants in the public workforce system who receive training and attain a degree or certificate by June 2013 by ten percent. Occupations that usually require an industry-recognized credential or post-secondary degree are expected to account for nearly half of all new jobs from 2008 to 2018 and one-third of total job openings with the fastest growth will occur in occupations requiring an associate degree.

ETA encourages States and local workforce areas to review TEGL 15-10 (http://wdr.doleta.gov/directives/attach/TEGL15-10.pdf) for strategies to increase the rate of credential attainment among workforce program participants and improve the quality of those credentials. Increasing credential attainment requires aligning state and local policies and service delivery models to help customers successfully complete training. State and local workforce investment boards are well positioned to convene the diverse group of stakeholders needed to frame a common vision as to how best develop effective strategies to increase credential attainment rates.

Therefore, ETA recommends the following strategies to enhance jobseeker competitiveness:

**A. Support the Expansion of Career Pathways Models**

In 2010, the Departments of Labor, Education, and Health and Human Services partnered to launch the Pathways Out of Poverty initiative, funding 11 grantees to create well-articulated and sustainable career pathways. The grantees were provided with technical assistance, access to subject matter experts, and the latest research on career pathways. As a result of the initiative, a comprehensive set of technical assistance tools and resources was created to help states and local areas to implement effective career pathways models. In April 2012, the Assistant Secretaries of ETA, the Office of Vocational and Adult Education (OVAE) and the Administration for Children and Families (ACF) issued a joint letter of support encouraging states and local areas to collaborate and leverage resources to build and expand career pathways systems for youth and adults. The Career Pathways technical assistance tools can be viewed at https://learnwork.workforce3one.org.
ETA encourages states and local workforce areas to consider the following strategies to build and expand career pathways models:

- **Collaborate with secondary and post-secondary education and employers to design and deliver training** that integrates basic skills education with contextualized learning and helps students attain work readiness skills. A well-known example of a successful career pathways program is Washington’s Integrated Basic Education and Skills Training (I-BEST) program. Students are co-enrolled in adult education and post-secondary technical training that is jointly designed by basic skills instructors and college-level technical faculty members. Under the I-BEST model, instruction in basic skills/English as a Second Language is integrated with technical skills instruction, allowing adult education students to begin earning college credit while still in enrolled in adult education. More information on Washington’s I-BEST model can be found at [http://www.sbctc.ctc.edu/college/e_integratedbasicknowledgeandskillstraining.asp](http://www.sbctc.ctc.edu/college/e_integratedbasicknowledgeandskillstraining.asp).

- **Convene cross-agency partnerships to develop career pathways systems** that focus on high-growth, high-demand industry sectors and help advance the employability of low-skilled, low-income adults. States like Minnesota, Arkansas, and Wisconsin have developed comprehensive partnerships with community colleges, Temporary Assistance to Needy Families (TANF) agencies, and chambers of commerce to design successful state-level career pathways initiatives.

- **Work with local and regional employers** to identify and validate in-demand credentials that have value for business and the individuals who earn them. ETA will use input from the business community to identify and disseminate information on the quality and value of various credentials. More information on licenses and certificates, including new icons designating quality indicators for specific certifications, can be found in the Workforce Credentials Information Center at [http://www.careeronestop.org/credentialing/CredentialingHome.asp](http://www.careeronestop.org/credentialing/CredentialingHome.asp).

**B. Expand the Use of Learn-and-Earn Training Models**

Learn-and-earn training models are particularly relevant for low-income or under-skilled workers who seek better jobs and career success. Employers who cannot find workers with the requisite skills necessary to fill a certain job can also benefit greatly from these models. Models, like on-the-job training (OJT) and Registered Apprenticeships, can bridge the divide between unemployment and employment by addressing gaps in an individual’s skill level that would hinder them from fully performing a new job. Some learn-and-earn models offer the unique opportunity to offset initial training costs for employers to fill skilled positions while building organizational productivity as the participant learns job requirements. Most programs feature modular or “chunked” curricula that allow workers to gain credentials on the way to attaining a full-time job.
Data show that individuals who participated in OJT funded under WIA and registered apprenticeship programs in the past have demonstrated improved labor market attachment and enhanced job tenure, as illustrated by high rates of job placement and retention. In FY 2011, the average starting wage for an individual enrolled in a registered apprenticeship program was $16.01 per hour or $33,301 per year, with wages upon completion of a three to four year apprenticeship at $26.36 per hour or $54,829.

In order to expand the use of these strategies, ETA encourages states and local areas to:


- **Increase access to learn-and-earn training models**, like OJT and registered apprenticeships, which offer both academic and occupational credentials and improve job placement prospects for customers. Strategies and tools to create and implement successful OJT programs can be found in ETA’s Building the Next Generation On-the-Job Training Toolkit at [https://ojttoolkit.workforce3one.org/](https://ojttoolkit.workforce3one.org/).

- **Review and, where possible, create state- and local-level policies** that encourage the implementation of strategies that provide for the innovative delivery of courses and instruction, such as learn-and-earn programs.

7. **Meeting Dual Customer Needs.** It is more important than ever that the workforce system match its employment and training investments in jobseekers to the skills and workforce demands of employers. From applicant screening and job-writing assistance, to OJT and Rapid Response services, states and local areas have valuable assistance to provide at every stage of the business life cycle. The workforce system has worked to improve, refine, and expand employer resources to meet their changing needs while also addressing the employment and career advancement needs of jobseekers. Yet, there are still many companies that do not view the workforce system as a business partner.

ETA recommends the following strategies to states and local areas to ensure that the system is providing high-quality services to the business community and jobseekers:

- **Use labor market information and other data to build strategies.** To deliver high-value services to businesses and jobseekers, states and local areas must base policy and service delivery strategies on a strong understanding of current labor market dynamics and expected growth in regional industry and economic sectors. Through Workforce Information Grants, states are able to secure or develop and provide data, information services, tools, and resources to the workforce system and other partners, including education and economic development. Local areas may also need to look to additional sources of economic and labor market data to customize their business
engagement strategies. An analysis of job creation trends within regional economies may help identify new business partners likely to grow in the near-term. Similarly, an analysis of regional labor market information, paired with an analysis of the skills of the current jobseeker customer pool can help identify businesses and industry sectors that may produce promising job connections.

- **Expand business engagement capacity.** States and local areas use a variety of strategies to engage and retain business customers. To support states and local areas in this role, ETA provides training curricula for Business Service Representatives (BSRs) and other staff, such as Rapid Response professionals, who serve as main points of contact for businesses at [http://businessengagement.workforce3one.org/](http://businessengagement.workforce3one.org/). The site contains tools and resources on engaging businesses and delivering business services with the goal of helping states and local areas become more effective at Partnering with and serving their business customers. ETA encourages the exploration of these tools and integration of them into business engagement strategies.

- **Measure success.** As states and local areas refine and expand business services, they can develop strategies for measuring impact and success that reflect both jobseeker and business customer outcomes. States and local areas are encouraged to build the capacity to clearly articulate the outcomes employers want to achieve through their work with the workforce system, and to identify strategies that will help determine if those outcomes resulted from the workforce service.

8. **Inquiries.** Questions regarding this guidance should be directed to the appropriate ETA regional office.

9. **Attachment.** Tools You Can Use