

EMPLOYMENT AND TRAINING ADMINISTRATION ADVISORY SYSTEM U.S. DEPARTMENT OF LABOR Washington, D.C. 20210	CLASSIFICATION Wagner-Peyser/Performance Reporting
	CORRESPONDENCE SYMBOL OPDR
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ADVISORY: TRAINING AND EMPLOYMENT GUIDANCE LETTER NO. 35-11

TO: STATE WORKFORCE AGENCIES
STATE WORKFORCE ADMINISTRATORS
STATE WORKFORCE LIAISONS

FROM: JANE OATES /s/
Assistant Secretary

SUBJECT: Early Collection of Service Data on Post-9/11 Era Veterans

1. **Purpose.** To inform states of the guidelines and process for the interim collection of data on the provision of intensive services to post-9/11 era veterans through the Wagner-Peyser Employment Service.

2. **References.**

- Workforce Investment Act of 1998 (WIA) Sections 134 and 136; as amended (29 U.S.C. 2864 and 29 U.S.C. 2871);
- Wagner-Peyser Act, as amended (29 U.S.C. 49 et seq.);
- Wagner-Peyser regulations, 20 CFR 653.107;
- 38 U.S.C. 4215, Priority of Service for Veterans in Department of Labor Job Training Programs (originally added by Section 2(a)(1) of the Jobs for Veterans Act (JVA) of 2002, P.L. 107-288);
- Priority of Service for Covered Persons regulations at 20 CFR 1010.330;
- VOW to Hire Heroes Act of 2011(VOW Act), Title II of P.L. 112-56), Section 239;
- Training and Employment Notice (TEN) 15-11, *Gold Card Initiative*;
- Training and Employment Guidance Letter (TEGL) 28-11, *Program Year 2011/Fiscal Year 2012 Performance Reporting and Data Validation Timelines*;
- TEN 15-10, *Protocol for Implementing Priority of Service for Veterans and Eligible Spouses in all Qualified Job Training Programs Funded in Whole or in Part by the U.S. Department of Labor*;
- TEGL 10-09, *Implementing Priority of Service for Veterans and Eligible Spouses in all Qualified Job Training Programs Funded in Whole or in Part by the U.S. Department of Labor*; and
- Employment and Training Administration (ETA) 9002 and Veterans' Employment and Training Service (VETS) 200 Data Preparation Handbook No. 406.

RESCISSIONS None	EXPIRATION DATE March 31, 2013
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3. Background. On August 5, 2011, President Obama announced a comprehensive plan to lower veterans' unemployment by ensuring service members leave the military career-ready and smoothly transition into civilian careers. One of the resources to help veterans apply their military skills in the civilian workforce is the Gold Card Initiative (Initiative), a joint effort of the Department of Labor's Employment and Training Administration (ETA) and Veterans' Employment and Training Service (VETS). The Initiative was announced and Gold Card services were made available to post-9/11 veterans beginning on November 7, 2011. This Initiative provides post-9/11 era veterans with enhanced intensive services including 6 months of follow-up services.

It is projected that over one million service members will leave the military between 2011 and 2016. The most recent Bureau of Labor Statistics data shows unemployment for post-9/11 era veterans is currently at 9.2 percent (compared to a national unemployment rate of 8.1 percent) as of April 2012. Under the Gold Card Initiative, a post-9/11 era veteran is entitled to enhanced intensive services including six months of follow-up services. These Gold Card services will include the following:

- Job readiness assessment, including interviews and testing;
- Development of an Individual Development Plan;
- Career guidance through group or individual counseling that helps veterans in making training and career decisions;
- Provision of labor market, occupational, and skills transferability information that inform educational, training, and occupational decisions;
- Referral to job banks, job portals, and job openings;
- Referral to employers and registered apprenticeship sponsors;
- Referral to training by WIA-funded or third party service providers;
- Monthly follow-up by an assigned case manager for six months; and
- Any other intensive service as defined under WIA, Section 134(d)(3).

4. Purpose of the Data Collection. At the time of the Initiative's implementation, there was no existing collection that included data elements on post-9/11 era veterans and the services received under the new Initiative. Under the priority of service regulation at 20 CFR 1010.330, states are required to report on services provided to veterans in qualified job training programs. Accordingly, states must report on services provided to veterans under the Gold Card Initiative.

To implement collection of data related to the Gold Card Initiative, new data elements have been proposed as part of the Information Collection Request (ICR) in the Labor Exchange Reporting System (LERS), OMB control number 1205-0240. However, until approval to modify LERS is obtained from OMB and reports are submitted, a **monthly** data collection is necessary. The monthly collection will provide sufficient data points to understand service levels in the near term for technical assistance, and to establish statistically validated performance expectations when the new data element is fully implemented in LERS. Quarterly data would neither be available soon enough nor would it be sufficient to identify variations in performance for the coming months in order to provide technical assistance, conduct corrective action, or set benchmarks in the data system itself.

5. Overview of Data Collection process. The monthly collection for the Gold Card Initiative will be completed through a survey. The survey will be conducted through either the web-based program, Survey Monkey (<http://www.SurveyMonkey.com>) or an equally viable electronic collection tool. At the start of each month an e-mail containing a link to the survey will be disseminated to the identified state personnel with a request for the data concerning the number of post-9/11 era veterans served and the services they received (as explained in further detail below). Upon submission, the data will be securely transmitted to the contractor facilitating the collection of the data for the duration of the survey and a state-level report will be generated. A regional summary report will be available for regional and local areas information and use. The initial survey request, in June, 2012 will ask for data from program inception through May 31, 2012. All subsequent surveys will request data only for the preceding month.

The survey will request the following three data elements:

- 1) A two letter state code;
- 2) How many post-9/11-veteran participants are new enrollees in your program? (*By new enrollees, we mean individuals who have been enrolled in your program during the current month.*)
- 3) How many participants of your post-9/11-veteran new enrollees received intensive or staff-assisted services? (*By intensive or staff-assisted, as defined by the current Wagner-Peyser definitions.*)

For **question number two**, the number of post-9/11 era veterans participants who are new enrollees in the state's Wagner-Peyser Employment Service is determined by the number of "**discrete new**" participants enrolled during the reporting month. As outlined in TEN 15-11, identification of a post-9/11 era veteran should be determined at intake by local staff. Local staff may be able to make this determination through their existing process, or through an identified verification step that was determined by state and/or local offices at the implementation of the Gold Card Initiative. To be counted in the number of new enrollees, the post-9/11 era veteran will have been identified as eligible, referred to an assigned case manager and complete the appropriate enrollment documents to receive intensive or staff assisted services.

For **question number three**, intensive services, under the Gold Card Initiative, are defined as services provided to job seekers who received staff-assisted or intensive services, as described in WIA Section 134(d)(3). Intensive or staff-assisted services are further defined in the 406 Handbook for ETA form 9002 A-E and the VETS 200 forms. They may also include any other service requiring significant expenditure of staff time, including the prescribed 6 months of follow up services. This question should represent a subset of the number of post-9/11 era veterans participants who are new enrollees in the state's Wagner-Peyser Employment Service.

Data collected will be reported as an aggregate total by each state and submitted to the contractor managing the survey reporting. Aggregate monthly regional summaries will be available following the collection and aggregation of all state data each survey period. ETA staff will work with the contractor managing the survey reporting to provide follow up support in the event of a non-response for any state. The contractor will be responsible for managing the data system and informing ETA of any reporting issues that occur throughout the duration of the survey.

6. Collection Timeline. The first survey request will be sent out in June, 2012 to collect data for the program from its inception through May 31, 2012 in order to obtain historical data on the program from implementation to date. Subsequent surveys, starting July 2, 2012 will limit the request to only those participants enrolled during the preceding reporting month. State personnel responsible for reporting state data will have a 10-business day period (except for the first report, which will have a 15-business day period) to respond to the survey request for data. The survey collection will conclude December 31, 2012, with a final, closeout survey January 2, 2013. The timeline for collection extends over an eight month period and is outlined by date of collection in the table below:

<i>Month of Collection</i>	<i>Initial Survey Request</i>	<i>Submission Deadline</i>
November 2011 through May 2012	June, 2012	June 25, 2012
June 2012	July 2, 2012	July 16, 2012
July 2012	August 1, 2012	August 15, 2012
August 2012	September 4, 2012	September 18, 2012
September 2012	October 1, 2012	October 15, 2012
October 2012	November 1, 2012	November 15, 2012
November 2012	December 3, 2012	December 16, 2012
December 2012	January 2, 2013	January 16, 2013

7. Action Requested. States should disseminate this guidance to personnel responsible for reporting on Wagner-Peyser Act programs, including all local areas so that immediate collection of this data may take place.

8. Inquiries. Please direct questions regarding this notice and instructions to the appropriate regional office.

9. Attachment. Gold Card Initiative – Monthly Survey of Program Provision of Services