

Training and Employment Notice (TEIN) 11-98
Attachment A

SPR

SOCIAL POLICY RESEARCH ASSOCIATES

**Estimated Baseline Departure Points and
Adjustment Models for Performance Standards
Based on Wage Records**

August 6, 1998

Prepared by:

David Wright
Richard West

Prepared for:

Office of Policy and Research
Employment and Training Administration
U.S. Department of Labor
200 Constitution Avenue NW
Washington, DC 20210

DOL Contract No. K-5950-6-00-80-30

200 Middlefield Road, Suite 100, Menlo Park, CA 94025
Phone (650) 617-8625/Fax (650) 617-8630

ESTIMATED BASELINE DEPARTURE POINTS AND ADJUSTMENT MODELS FOR PERFORMANCE STANDARDS BASED ON WAGE RECORDS

BACKGROUND

DOL has granted waivers to several States that allow them to replace the current JTPA Title II-A follow-up performance measures with alternative measures based on wage records beginning in PY 1997. In addition, DOL has decided to give a similar option to all States in PY 1998. To help support States that use wage records to calculate performance measures, DOL has asked SPR to:

- Derive baseline departure points for wage-record measures that are comparable to the national standards for the existing follow-up measures. The phrasing "baseline departure points" is intended to recognize that the estimates of appropriate levels for standards based on wage records are derived from data with serious limitations and can be expected to be revised over time as better data become available.
- Develop adjustment models that can be used to adjust the baseline departure points for client characteristics and local economic conditions that are similar to the models used for the existing follow-up measures.

The national standard for most of the current measures is set so that at least three-quarters of SDAs are expected to exceed. The adjustment model provides a method for developing adjustments for client characteristics and local economic conditions that, when added to the national standard, creates a 'model adjusted' standard. An SDA with a high unemployment rate, for example, will have a lower standard than an SDA with a low unemployment rate.

The purpose of this paper is to present our derivation of baseline departure points and present adjustment models for wage-record performance standards.

The pilot performance measures that DOL adopted for PY 1998 are different than the measures that were specified for use by the waiver States (information applicable only to the Waiver States will be available in a separate document.):

- **Optional Pilot Measures.** These measures use a criterion of earnings equivalent to 20 hours per week for 13 weeks at the minimum wage (\$1,339) to determine "employment" during the second quarter after termination. These measures may be adopted by all States for PY 1998. The measures and requirements for use are specified in *Training and Employment Guidance Letter No. 12-97*. DOL is also encouraging waiver States to use the optional pilot measures instead of the waiver measures
- **Waiver Measures.** These measures use a criterion of earnings equivalent to 20 hours at the minimum wage (\$103) to determine "employment" during the second quarter after termination. These measures may be used by States granted waivers for both PY 1997 and PY 1998.

Because PY 1998 begins a new two-year JTPA planning cycle, PY 1998 national standards have different values than the PY 1997 national standards. Therefore, in this paper we present estimates of baseline departure points and adjustment models only for those States choosing to use the new optional pilot measures for PY 98:

- **The optional pilot measures for PY 1998.** The estimated baseline departure points for these measures are based on PY 1995/96 performance. For consistency with the estimated baseline departure points, the national averages of the local factors in the adjustment models are also based on PY 1995/96 data.

DATA SOURCES

In order to derive estimated baseline departure points and adjustment models for wage-record performance measures, we needed data for Title II-A terminees on postprogram wage records, the regular JTPA follow-up outcomes, demographic characteristics and local unemployment conditions.

Data on wage records and demographic characteristics were obtained from data files submitted to DOL by States who received demonstration grants to examine the *Use of Wage-record Data for JTPA Performance Standards*. Florida, Georgia, Illinois, Indiana, Maryland, Nevada, Oregon, Tennessee, and Washington all contributed data for PY 1991. These JTPA data closely resemble what are now known as "SPIR" data--terminee level data with variables such as follow-up earnings, hours worked, entered unsubsidized employment, and AFDC.

There seemed to be problems with the regular Title II-A follow-up information in these state-provided data files--average outcomes were considerably lower than reported on the JASR. Therefore, information on the Title II-A follow-up outcomes was drawn from the PY 1991 JTPA Annual Status Report (JASR). Local economic conditions were derived from BLS and Census data.

Because only a few States provided data, it is important to determine whether those States are reasonably representative of all States. Exhibit 1 shows a comparison of follow-up outcomes reported on the JASR between all SDAs in PY 1991 and the SDAs in the sample. There is very little difference between the sample and population estimates for follow-up employment rates or average earnings. The adult follow-up employment rate for all States in PY 1991 was 63.2%, while in the sample it was 63.4%. The differences in average weekly earnings were also small, on the order of 5-10 dollars. Overall, there is good reason to believe that the sample of States selected for the analysis is consistent with the population at large.

Exhibit 1
Population and Sample Statistics for PY 1991 data

| Performance Measure | PY 1991 Populatio n | PY 1991 Sample |
|-----------------------------------|------------------------------------|---------------------------|
| Adult Follow-up Employment Rate | 63.2% | 63.4% |
| Adult Follow-up Weekly Earnings | \$242 | \$235 |
| Welfare Follow-up Employment Rate | 53.1% | 52.9% |
| Welfare Follow-up Weekly Earnings | \$220 | \$216 |

DEVELOPING BASELINE DEPARTURE POINTS

Optional Pilot Measures for PY 1998

The first step in developing standards based on wage records is to define the performance measures. DOL has already defined the optional pilot measures that all States can use in PY 1998. Similar in spirit to follow-up measures--which require employment of 20 hours or more--these optional pilot measures require terminees to earn an amount equivalent to working 20 hours or more at the minimum wage throughout the second quarter after termination.

The optional pilot measures are:

1. **Adult Pilot Sustained Employment Rate (APSER):** percentage of terminees in the program year with wage-record earnings (in the second full calendar quarter after termination) of at least 13 weeks x 20 hours x the minimum wage (currently \$5.15), or \$1,339. The cohort should be those terminees subject to performance standards--Title II-A terminees who receive services beyond objective assessment and are not exempt from performance standards.
2. **Adult Pilot Sustained Quarterly Earnings (APSQE):** The average earnings in the quarter for those employed as defined in "1" above.
3. **Welfare Pilot Sustained Employment Rate (WPSER):** percentage of welfare terminees in the program year with wage-record earnings (in the second full calendar quarter after termination) of at least 13 weeks x 20 hours x the minimum wage, or \$1,339. Welfare terminees include those receiving AFDC or TANF, Refugee Assistance or General Assistance. The cohort should be those terminees subject to performance standards--Title II-A welfare terminees who receive services beyond objective assessment and are not exempt from performance standards.
4. **Welfare Pilot Sustained Quarterly Earnings (WPSQE):** The average earnings in the quarter for welfare terminees who are employed as defined in "3" above.

In conducting the analysis on the PY 1991 data for these models, we used definitions that differ slightly from those above. In particular, we used the minimum wage in PY 1991, \$4.25. Thus, the criterion for determining employment in the quarter was wage-record earnings above \$1,105 dollars rather than above \$1,339 dollars.

The methodology we used to compute estimated baseline departure points for the wage-record measures is similar to the methodology used to derive national standards for the regular JTPA performance standards. We calculated SDA-level values for each of the four measures (APSER, APSQE, WPSER, and WPSQE) after deleting SDAs with extreme or missing data.

Exhibit 2 show averages and percentiles of the wage-record measures we calculated to correspond to the way the regular national standards were developed. The 25th percentile is used for the APSER and WPSQE, the 35th for the APSQE, and the 20th for the WPSER, based on data from PY 1995 and PY 1996. These percentiles were selected to correspond to the percentiles used to determine the national standards for the regular follow-up measures.

Exhibit 2
Estimates of Baseline Departure Points for Wage-Record Measures
for PY 1998 and PY 1999

| <u>Wage-Record Performance Measure</u> | <u>Average</u> | <u>Percentile in PY 1991</u> | <u>Adjusted for Out-of-State Employment</u> | <u>Adjusted for Inflation</u> | <u>Adjusted for Performance Improvement</u> | <u>Selected Baseline Departure Point</u> |
|--|----------------|--------------------------------------|---|---------------------------------------|---|--|
| APSER | 49.6% | 44.6% | 47.4% | 47.4% | 49.3% | 50% |
| APSQE | \$3,215 | \$3,095 | -- | \$3,566 | \$4,023 | \$3,566 |
| WPSER | 42.6% | 34.6% | 36.8% | 36.8% | 42.7% | 50% |
| WPSQE | \$2,930 | \$2,672 | -- | \$3,079 | \$3,500 | \$3,079 |

One possibility would be to use the percentiles of the PY 1991 data for the estimated baseline departure points. However, because the PY 1998/99 standards will be based on JTPA outcomes in PYs 95 and 96, these percentiles would lead to standards that are too low (lenient) for three reasons.

First, the PY 1991 data set did not include wage-record information on out-of-state employment. Because those who are placed in jobs out of State are not recorded in the wage-record system, all individuals placed out of State were treated as *not* employed. Hence, measured performance is somewhat less than actual performance. An examination of the PY 1996 SPIR data showed that 94.1% of all individuals placed were placed in State. Therefore, to adjust the employment rates (APSER and WPSER) for out-of-state employment, we divided the PY 1991 percentiles by 0.94 --an increase of just over 6%. The results are shown in the column titled "Adjusted for Out-of-State Employment."

Second, the earnings measures do not incorporate inflation PY 1991 to PY 1996. To account for inflation, we adjusted the earnings measures by inflation between PY 1991 to PY 1996 (15.2% over the five years).

The adjusted levels are shown in Exhibit 2 in the column titled "Adjusted for Inflation."

Third, as shown in Exhibit 3, JTPA Title II-A performance increased from PY 1991 to PY 1995/96--average follow-up employment rates increased and earnings increased by more than the inflation rate. We can expect wage-record measures to show similar system wide improvements. To adjust for this performance improvement, we multiplied the percentiles (adjusted for out-of-state employment) by the ratio of PY 1995/96 to PY 1991 performance of the corresponding regular performance measures.¹ The result is shown in Exhibit 2 in the column titled "Adjusted for Performance Improvement." This method takes into account changes in economy wide employment trends and performance by assuming that the change in follow-up conditions is similar to changes in wage-record earnings. This is a reasonable assumption since both series will rise or fall over time as the business cycle expands or contracts.

Exhibit 3
Averages of Regular Follow-Up Measures

| | PY 1991 Average | PY 1995-96 Average | Ratio PY 1995-96/PY 1991 |
|-----------------------------------|----------------------------|-------------------------------|-------------------------------------|
| Adult Follow-Up Employment Rate | 63.4% | 66.1% | 1.04 |
| Adult Follow-Up Weekly Earnings | \$235 | \$306 | 1.30 |
| Welfare Follow-Up Employment Rate | 52.9% | 61.5% | 1.16 |
| Welfare Follow-Up Weekly Earnings | \$216 | \$283 | 1.31 |

We did not make adjustments for uncovered employment because we did not have usable data with which to make them. As a result, the estimates for the employment rate standards are probably somewhat low.

Based on this information and the recommendations of a technical workgroup, DOL decided to base the baseline departure points for the earnings measures on only the inflation adjustment. However, the baseline departure points for the employment measures were set at 50% to encourage obtaining successful outcomes for at least half of terminees. The baseline departure points selected by DOL are shown in the final column of Exhibit 2.

DEVELOPING ADJUSTMENT MODELS FOR WAGE-RECORD MEASURES

We also used the data provided by States to develop adjustment models for wage-record performance standards. Models for each of the four performance measures are presented at the end of this section in worksheet format.

Many of the coefficients in the employment models are close to the PY 1996/97 model for the corresponding regular follow-up measure. For example, the weight for the variable 'Age 55 or more' for the APSE is -0.117, whereas in the regular follow-up model it is -0.105. The weight for 'Not a high school graduate' is -0.097 whereas in the regular model it is -0.073.

Because average quarterly wage-record earnings have a much higher average than regular follow-up weekly earnings, we do not expect the same value for the coefficients. However, it is possible to get a

¹ Corresponding follow-up measures include adult and welfare employment rates (AFER and WFER) and average weekly earnings (AFWE and WFWE). Also shown are the ratios used for the PY 1997 models.

general idea of the differences between the earnings variables. For example, the weight for ‘% families below poverty’ in the regular adult earnings model is -0.957, which is 0.3% of the national departure point (\$281). The weight in the APSQE model is -7.660., which is 0.2% of the upper bound for the PY 1996/97 national departure point (\$3,865). This, even though the weights for the wage-record standards are so much larger than their follow-up counterparts, it really is an illusion due to the fact that the definition of the outcome has changed substantially².

There were some important differences between the models, as noted here:

- A few SPIR items were not on the PY 1991 data set used in this study, such as SSI and Math Reading Level. The absence of the SSI variable meant that the ‘Cash-Welfare’ variable could not be computed. Instead, the SPIR definition of welfare (AFDC, Refugee Cash Assistance, or General Assistance) was used. ‘Basic Skills deficient’ also could not be computed and instead reading level at less than 7th grade level was substituted.
- A few items were not used in the wage-record models such as "Other Minority," "Minority Male" and "Limited English Speaking" because their coefficients often had counter-intuitive signs and/or changed radically with different models.
- Because of the relatively small number of States in the data set, there is much less variation in local economic conditions than in the full data sets used for the regular models.

Consequently, we had some difficulty estimating the weights for the local economic conditions. The unemployment rate was the only economic variable used for the employment rate models. Generally, the wage-record models have a smaller set of local economic conditions than appear in the standard follow-up models.

To conclude, the new adjustment models for wage-record standards are generally similar to their follow-up counterparts. These models can be used to adjust the estimated baseline departure points provided earlier in this memo (in Exhibit 2) for local economic conditions and participant characteristics.

The attached worksheets include:

Optional Pilot Measures for PY 1998. These are PY 1998 models for measures selected by DOL, which are based on the employment criterion of \$1,339 in earnings (equivalent to 20 hours per week for 13 weeks at the minimum wage). The averages of the local factors are based on PY 1995/96, the same time period used to determine the estimated baseline departure points.

ADDITIONAL INFORMATION

Adjustment for Out-of-State and Noncovered Employment. A worksheet and instructions for adjusting performance for out-of-state and noncovered employment are attached. In implementing the adjustment, individuals should be treated as placed out of State if they are placed in a State from which wage records are not obtained. Individuals placed in a State from which wage records are obtained should be treated as placed "in State." In addition, individuals placed in jobs that have separate wage record systems from which wage records are not obtained should be treated as out of State. Examples of separate wage records systems include federal employment, military employment, postal employment, railroad employment, and State employment (in some States). Employers who do not report wage

²The largest weight for the earnings model is for the annual earnings variable. There, the weight is about 44 for both the adult and welfare models. For the adults, the weight is about .8% of the standard in the follow-up model, but in the wage-record model it is 1.1%--a small percentage point difference.

records (e.g., reimbursable employers such as nonprofit organizations and local governments in some States) should be treated as noncovered.

Tolerance Ranges. Tolerance ranges for the PY 1998 *pilot* measures are presented below. These tolerance ranges were calculated to give Governors the same flexibility in adjusting departure points for wage record measures as they have for the regular follow-up measures.

- Adult pilot sustained employment rate 2.7%
- Adult pilot sustained quarterly earnings \$148
- Welfare pilot sustained employment rate 3.9%
- Welfare pilot sustained quarterly earnings \$157

Telephone Survey 5% Sample. States participating in the pilot are required to continue to conduct the telephone follow-up survey for a 5% sample of terminatees from Title II-A and/or Title III, as appropriate. The 5% sample survey should be conducted using the same procedures as the existing follow-up survey except for using the 5% sample. In particular:

- The 5% sample follow-up should be conducted for the first three quarters of the program year and the last quarter of the previous program year.
- The 5% follow-up data should be included in the regular SPIR submission due August 15 after the end of the program year.
- The 5% sample should be selected randomly. The State can choose either a 5% statewide sample or a 5% sample in each SDA/SSA.
- The 70% response rate requirement applies.

The 5% sample is designed to provide the information needed to estimate *national* JTPA outcomes. The sample sizes will *not* be large enough to estimate performance at the State level, except in very large States. ETA does not plan to use these data to measure and evaluate State performance.

Incentive and Sanction Policies. The time lag in the availability of performance information based on wage records raises some serious challenges for States' incentive and sanction policies. The implications of the time lag can be considered in the following example. Postprogram outcomes for individuals who terminate in the last quarter of PY 1998 (April to June 1999) occur two calendar quarters later (October to December 1999). Employers report these data to the State in the following quarter (January to March 2000) and the State's database may not be complete until sometime in the next quarter (April to June 2000). Thus, the State will not be able to measure PY 1998 performance based on wage records until about one year after the end of the program year.

States using wage records to measure performance are required to develop for ETA approval incentive and sanction policies that address this delay. For incentive policies, States have at least two options:

1. Wait up to one year to determine performance and award incentives for both adult and youth performance. For example, the State could make PY 1998 awards in June to September of 2000. The basic problem with this option is the transition--no incentive

awards would be made in September of 1999. A year without incentive awards would not be very popular with SDAs.

2. Make awards for youth performance at the usual time along with awards for adult performance in the *previous* program year. This option allows the State to continue awarding incentives every year, although during the first year awards would be based only on youth performance and State standards. States choosing this option might want to implement State standards based on adult termination outcomes to provide more timely awards to SDAs for adult performance.

While the implications of the time lag for incentives are limited to a delay in the award of incentive funds, the implications for sanction policies are much more serious. The current JTPA system is predicated on providing SDAs that fail standards overall during a program year, technical assistance to avert failure in the next program year. However, SDAs that fail for "two consecutive program years" are subject to reorganization. With wage record follow-up, literal interpretation of "two consecutive program years" would deny SDAs of the opportunity to correct performance deficiencies. For example, performance for PY 1998 adult terminees is not available until approximately June of 2000, when PY 1999 is just about to end. Thus, by the time poor performance in PY 1998 is discovered there is no opportunity to improve performance in PY 1999, which is already nearly over. One way to address this problem is to change the interpretation to explicitly allow SDAs a year after identification of the initial failure to improve performance before becoming subject to sanctions. For example, if an SDA is identified in June of 2000 as failing PY 1998 standards, performance in PY 2000 could be used as the second year in determining whether the SDA is subject to reorganization.

PY 1998 Worksheets
for DOL Selected Performance Measures Based on Wage Records
Optional Pilot Measures: 20 Hours per Week per Quarter
(For Use by All States Choosing to Pilot Wage Records For Follow-Up)

| | | | | | |
|--|---|---|---------------------------|---------------|---|
| PY 1998 JTPA Performance Standards Worksheet | | A. Service Delivery Area's Name | | B. SDA Number | |
| C. Performance Period | D. Type of Standard [] Plan [] Recalculated | E. Performance Measure: Adult Pilot Sustained Employment Rate (APSER) (Based on Wage Records) | | | |
| F. Local Factors | G. SDA Factor Values | H. National Averages | I. Difference (G Minus H) | J. Weights | K. Effect of Local Factors On Performance (I Times J) |
| 1. % Age 55 or more | | 1.9 | | -0.117 | |
| 2. % Not a high school graduate | | 17.8 | | -0.097 | |
| 3. % Black | | 26.4 | | -0.060 | |
| 4. % Welfare recipient | | 38.5 | | -0.065 | |
| 5. % Long-term TANF recipient | | 15.3 | | -0.054 | |
| 6. % Individual with disabilities | | 8.1 | | -0.110 | |
| 7. % Lacks significant work history | | 32.4 | | -0.086 | |
| 8. % Vietnam-era veteran | | 2.2 | | -0.057 | |
| 9. % Not in labor force | | 32.2 | | -0.070 | |
| 10. % Unemployed 15 wks or more | | 31.9 | | -0.037 | |
| 11. Unemployment Rate | | 5.7 | | -0.050 | |
| L. Total | | | | | |
| M. NATIONAL DEPARTURE POINT | | | | | 50.0 |
| N. Model-Adjusted Performance Level (L + M) | | | | | |
| O. Governor's Adjustment | | | | | |
| P. SDA Performance Standard | | | | | |

| | | | | | |
|---|---|--|---------------------------|---------------|---|
| PY 1998 JTPA Performance Standards Worksheet | | A. Service Delivery Area's Name | | B. SDA Number | |
| C. Performance Period | D. Type of Standard [] Plan [] Recalculated | E. Performance Measure: Adult Pilot Sustained Quarterly Earnings (APSQE) (Based on Wage Records) | | | |
| F. Local Factors | G. SDA Factor Values | H. National Averages | I. Difference (G Minus H) | J. Weights | K. Effect of Local Factors On Performance (I Times J) |
| 1. % Female | | 71.3 | | -4.367 | |
| 2. % Age 55 or more | | 1.9 | | -4.097 | |
| 3. % Not a high school graduate | | 17.8 | | -3.065 | |
| 4. % Post-high school attendee | | 26.1 | | 4.448 | |
| 5. % Black | | 26.4 | | -3.257 | |
| 6. % Welfare recipient | | 38.5 | | -1.755 | |
| 7. % Reading at less than 7th grade level | | 11.3 | | -3.173 | |
| 8. % Individual with disabilities | | 8.1 | | -4.623 | |
| 9. % Lacks significant work history | | 32.4 | | -2.368 | |
| 10. % Unemployed 15 or more wks | | 31.9 | | -0.122 | |
| 11. % UC claimant or exhaustee | | 13.2 | | 3.517 | |
| 12. Annual earnings in retail and wholesale trade | | 17.3 | | 43.512 | |
| 13. Empl. in manuf., agric., and mining | | 20.3 | | 7.158 | |
| 14. % Families below poverty | | 10.6 | | -7.660 | |
| 15. Employee/resident worker ratio | | 97.2 | | -3.922 | |
| L. Total | | | | | |
| M. NATIONAL DEPARTURE POINT | | | | | 3,566 |
| N. Model-Adjusted Performance Level (L + M) | | | | | |
| O. Governor's Adjustment | | | | | |
| P. SDA Performance Standard | | | | | |

| | | | | | |
|--|---|---|---------------------------|---------------|---|
| PY 1998 JTPA Performance Standards Worksheet | | A. Service Delivery Area's Name | | B. SDA Number | |
| C. Performance Period | D. Type of Standard [] Plan [] Recalculated | E. Performance Measure: Welfare Pilot Sustained Employment Rate (WPSEER) (Based on Wage Records)) | | | |
| F. Local Factors | G. SDA Factor Values | H. National Averages | I. Difference (G Minus H) | J. Weights | K. Effect of Local Factors On Performance (I Times J) |
| 1. % Female | | 87.7 | | -0.026 | |
| 2. % Age 55 or more | | 0.4 | | -0.012 | |
| 3. % Not a high school graduate | | 19.8 | | -0.104 | |
| 4. % Post-high school attendee | | 23.5 | | 0.045 | |
| 5. % Black | | 29.8 | | -0.030 | |
| 6. % Long-term TANF recipient | | 38.4 | | -0.043 | |
| 7. % Reading at less than 7th grade level | | 11.3 | | -0.037 | |
| 8. % Individual with disabilities | | 4.6 | | -0.064 | |
| 9. % Lacks significant work history | | 43.9 | | -0.048 | |
| 10. % Offender | | 10 | | -0.060 | |
| 11. % Not in labor force | | 45.1 | | -0.064 | |
| 12. % Unemployed 15 wks or more | | 34.6 | | -0.011 | |
| 13. Unemployment Rate | | 5.7 | | -0.812 | |
| | L. Total | | | | |
| | M. NATIONAL DEPARTURE POINT | | | | 50.0 |
| | N. Model-Adjusted Performance Level (L + M) | | | | |
| | O. Governor's Adjustment | | | | |
| | P. SDA Performance Standard | | | | |

| | | | | | |
|--|---|--|---------------------------|---------------|---|
| PY 1998 JTPA Performance Standards Worksheet | | A. Service Delivery Area's Name | | B. SDA Number | |
| C. Performance Period | D. Type of Standard [] Plan [] Recalculated | E. Performance Measure: Welfare Pilot Sustained Quarterly Earnings (WPSQE) (Based on Wage Records) | | | |
| F. Local Factors | G. SDA Factor Values | H. National Averages | I. Difference (G Minus H) | J. Weights | K. Effect of Local Factors On Performance (I Times J) |
| 1. % Female | | 87.7 | | -3.664 | |
| 2. % Age 55 or more | | 0.4 | | -2.920 | |
| 3. % Not a high school graduate | | 19.8 | | -2.707 | |
| 4. % Post-high school attendee | | 23.5 | | 4.294 | |
| 5. % Black | | 29.8 | | -3.390 | |
| 6. % Reading at less than 7th grade level | | 11.3 | | -2.560 | |
| 7. % Individual with disabilities | | 4.6 | | -3.142 | |
| 8. % Lacks significant work history | | 43.9 | | -0.824 | |
| 9. Annual earnings in retail and wholesale trade | | 17.3 | | 42.619 | |
| 10. Empl. In manuf., agric., and mining | | 20.3 | | 6.381 | |
| 11. % Families below poverty | | 10.6 | | -7.750 | |
| 12. Employee/resident worker ratio | | 97.2 | | -2.933 | |
| L. Total | | | | | |
| M. NATIONAL DEPARTURE POINT | | | | | 3,079 |
| N. Model-Adjusted Performance Level (L + M) | | | | | |
| O. Governor's Adjustment | | | | | |
| P. SDA Performance Standard | | | | | |