Appendix D

ETA Response to Draft Report

U.S. Department of Labor

Employment and Training Administration

200 Constitution Avenue, N.W. Washington, D.C. 20210

AUG 23 2010



MEMORANDUM FOR:

ELLIOT P. LEWIS

Assistant Inspector General for Audit Office of the Inspector General

FROM:

JANE OATES

Assistant Secretary

SUBJECT:

Audit of State Workforce Agency Evaluations of Workforce Investment Act Title IB Program Draft Audit

Report No. 03-10-003-03-390

Thank you for the opportunity to respond to your report cited above. The Employment and Training Administration (ETA) believes that state evaluations may identify best practices, replicable models, workforce challenges and potential solutions, and other resources that may be helpful to improving service delivery strategies for the nation's unemployed workers and job seekers, as well as employers. We agree that it is important to review these evaluation findings, and we will widely disseminate those best practices and other findings that are based on rigorous research and evaluation practices with the public workforce system.

Below are specific responses to findings in the report.

1. Develop and implement procedures to ensure that State Workforce Agencies (SWAs) conduct evaluations and when conducted, include them and best practice results in their Workforce Investment Act of 1998 (WIA) Annual Reports by clarifying the requirements in the Training and Employment Guidance Letter (TEGL).

In regard to this recommendation, there are areas addressed in the normal course of monitoring the WIA formula grantees which let us know how well the grantee determines the value and effectiveness of its services 1 and whether the grantee uses relevant and objective data to assess the quality of services delivered2. While the Guide does not explicitly ask whether there were state conducted evaluations during the Program Year, ETA managers encourage Federal Project Officers to refer to the required WIA State Plan document and the WIA Annual Report, which would often contain this information. Federal managers will continue to emphasize the importance of state conducted evaluations when training federal staff on grant management, the use of the Core Monitoring Guide, and the provisions of WIA section 136 (d) and (e) relative to WIA Annual Reports.

¹ Core Monitoring Guide, Core Activity 1 – Design and Governance, Indicator 1.23E

² Core Monitoring Guide, Core Activity 5 - Performance Accountability, Indicator 5.41E

We are in the process of reviewing and clearing an updated version of TEGL No. 14-00, which provides guidelines to states about the WIA Annual Report narrative, to clarify the information states should submit regarding evaluation studies of workforce investment activities as described in WIA Section 136(e).

 Develop in ETA a process to analyze evaluation results so that it can improve delivery of services nationally and be a proactive clearinghouse to the SWAs for best practices.

ETA's Office of Policy Development and Research (OPDR) is the central point for coordinating the review of evaluations, including their methodology. To pass such a review, evaluations should be required to follow sound research practices to ensure that the public can have confidence in the best practices and other findings that we share from state evaluations. ETA notes that the OIG identified 40 evaluations conducted over 4.5 years in the eight states in the sample, which projects to over 50 evaluations per year nationwide. Because of the volume, ETA will encourage states to voluntarily submit those evaluation reports they believe include rigorous research practices to their ETA Regional Office representative. Regional Office staff would make an initial review based on guidelines provided by OPDR, and would forward those which passed to the national office for final review.

ETA will share best practices, tools, and replicable models identified through state evaluations based on rigorous research practices through ETA's online technical assistance (TA) platform (www.Workforce3One.org) and at appropriate TA events. Additionally, results from state evaluations may inform ETA's policy development as well as its national evaluation and research agenda.

3. Implement a forum, such as a Website, where ETA and SWAs can easily access and share best practices described in the evaluations.

ETA agrees that it is important to widely disseminate best practices, replicable models, and other resources identified through state evaluations to the public workforce system. ETA staff will coordinate to ensure that best practices identified through state evaluations are shared on ETA's existing online TA platform (www.Workforce3One.org). Through this platform, ETA provides TA and shares best practices to over 70,000 individuals from the public workforce system and its strategic partners, including employers, Federal agencies, community-based organizations, and educators. Online TA is provided through a variety of formats, including live Webinars, pre-recorded presentations, and peer-to-peer learning through Communities of Practice.

Information shared through this platform is easily accessible to SWAs and other workforce leaders and frontline staff. We are exploring opportunities to improve the site's functionality, such as the ability to more easily identify best practices and to provide user feedback on tools and resources.