

Shared Accountability in WIOA and Career Pathways

DECEMBER 2014 | TIM HARMON

Several provisions in the Workforce Innovation and Opportunity Act (WIOA) promote shared accountability across workforce funding streams. Most notable are new common performance measures. CLASP welcomes this broadened approach, which will improve integration of effort to better serve low-income, lower-skilled individuals. So far, the shared accountability discussion has focused almost entirely on implementing the new common measures. However, shared accountability encompasses more than common measures; it has implications for each component of the performance management policy, such as how these measures are used, how (or whether) goals are set, and the consequences for success and failure in meeting the goals. This paper provides a framework for understanding the full scope of shared accountability and is intended to promote discussion of how WIOA performance accountability provisions could be aligned to integrate service delivery for low-income, lower-skilled individuals. How can we leverage WIOA's support for shared accountability toward these objectives?

In order to broaden the discussion about "shared accountability" across various programs, this paper provides a working definition and outlines WIOA provisions that encourage greater integration of accountability policies. It also describes the policy components that comprise a performance management system. The paper then presents a proposed framework for how shared accountability could be implemented through these policy components; it includes six distinct levels of progressively greater policy integration. This framework is based on discussions that took place during the development of the Alliance for Quality Career Pathways (AQCP) participant metrics.ⁱ Finally, the paper includes questions to guide further discussion of shared accountability.

Shared Accountability: A Working Definition

While WIOA expands opportunities for shared accountability, particularly among the core programs, much more could be done to build a true shared accountability system. What do we mean by "shared accountability?" CLASP offers the following working definition:

Shared accountability is a policy tool used to promote coordinated and effective service to participants who are or may be served by multiple funding streams or programs. A shared accountability system aligns the key functions of performance measurement, as well as the related policy elements that make up a performance management system, across this set of funding streams or programs to facilitate integrated service delivery.

Shared accountability could improve services to all participants, but it is especially likely to benefit low-income, lower-skilled participants. Specifically, these individuals would benefit from integrated service provision, including concurrent co-enrollment; sequential co-enrollment; provision of supportive services; and implementation of program designs that are better suited to their needs, such as significant levels of academic and occupational skill development, participation in work experience, and work-based learning. Shared accountability facilitates this by reducing disincentives to serve these individuals in an integrated manner. Disincentives include incompatible definitions of success, conflicting performance goals, and performance consequences that widely vary from one funding source to another. Shared accountability reduces these disincentives by aligning the relevant performance management policy components.

WIOA Provisions for Shared Accountability

WIOA includes the following provisions that encourage shared accountability among the core programs:

Common measures: WIOA includes common performance measures, or “primary indicators of performance,” for its six core programs (Title I Youth program, Title I Adult program, Title I Dislocated Worker program, Title II Adult Education and Family Literacy program, Title III Employment Service, and Title IV Rehabilitation Services program). While there are variations in the Title I Youth program and Employment Service, most measures are consistent across all six programs. This is the broadest application to date of common measures across the workforce system; it signals Congressional intent to promote more integrated programming and accountability at the state and local levels.ⁱⁱ In particular, the addition of a credential attainment rate and a skill gains rate will help align objectives across the core programs. WIOA also requires the development of one or more measures of effectiveness in serving employers.

Sanctions policy: WIOA changes provisions on federal-state sanctions to incentivize governors to develop an overall performance management strategy that incorporates each of the core programs. Under the revised sanctions provisions, performance failure in two consecutive years by any of the core programs will result in a 33 percent reduction in the governor’s discretionary funds under Section 128(a)—cutting the statewide set-aside funds from 15 percent to 10 percent.ⁱⁱⁱ Governors retain broad authority in the law to reorganize failing Local Workforce Development Boards (LWDBs) and take other actions to improve performance results, including the use of statewide set-aside funds for performance incentives. This provision raises the performance management stakes for governors and state workforce agencies.

Planning: WIOA requires a unified four-year plan for the core programs and permits states to develop a combined plan that includes additional programs, such as Career and Technical Education, Temporary Assistance for Needy Families (TANF), Supplemental Nutrition Assistance Program (SNAP), and programs under the Second Chance Act. WIOA also requires the local workforce board to review local providers’ applications for Title II adult education funding; likewise, providers are required to coordinate with the LWDB. These provisions are intended to foster a more cohesive workforce development strategy at the state and local levels.

Goal setting process: WIOA requires the unified plan to include performance goals for each core program’s common measures. It also requires the U.S. Departments of Labor and Education to jointly develop a statistical adjustment model to be used to set these goals. According to the law, the model should take into account, at a minimum, certain economic conditions and characteristics of participants. While the specifics of how these models will be developed and used have yet to be determined, WIOA has clearly expanded the context for setting these performance goals, which are expected to be set as part of an interagency negotiation process and connected to state and local plans.

Reporting requirements: WIOA imposes standard reporting requirements across the core programs, including results for each of the common measures of performance, demographic characteristics, program activities, and other elements. States and LWDBs must report the number of individuals with barriers to employment who are served by each core program, with specific breakdowns by subpopulation. LWDBs must also report on the number of individuals with barriers to employment who are served by the adult and dislocated worker program, with specific breakdowns by subpopulation, race, ethnicity, sex, and age.^{iv} Expansion and standardization of reporting requirements promotes shared accountability by improving transparency of results across the core programs.

Eligible training provider data policy: WIOA specifies common measures of performance for training institutions as a condition of receiving funds to train WIOA Title I participants. The reported results must include data for all students trained by the provider for a given program of study, not just those whose training is paid for by WIOA; furthermore, the Department has indicated that it will no longer grant a waiver of this requirement.^v By substantially broadening the application of performance reporting to encompass all participants in programs that train WIOA participants, this provision could lead to greater shared accountability.

Career pathways: WIOA makes development of career pathway strategies a function of the state and local workforce boards and a permissible activity under all parts of the Act. The career pathway approach provides a framework for state and local unified planning that reorients existing education and workforce services (including those authorized under WIOA) from myriad disconnected programs to one system focused on individuals' postsecondary and economic success.^{vi} Expanded use of career pathways increases the need for shared accountability, since career pathways are often developed and implemented across multiple programs and institutions. The need for a new model to measure participant progress was the main impetus for the career pathway metrics developed by the Alliance for Quality Career Pathways.^{vii}

Elements of the Performance Management System

While much of the discussion about performance management policy is focused on the performance measures, other elements of the performance management system are equally important. Aligning these elements can strongly encourage the coordination sought under a shared accountability system. These elements (Figure 1) include:

- *Policy objectives:* Each performance management system is based on a set of policy objectives, and these policy objectives determine how the other elements of the system are structured. For instance, a performance management system with an objective of significantly increasing the occupational skills of participants would have measures, goals, and consequences that promote that outcome.
- *Measures:* The measures define the types of outcomes that participants are meant to achieve. Ideally, they reflect the key legislative goals of the program. The measures serve to communicate these goals in unambiguous terms.
- *Measurement application:* This element refers to how the measures are applied in practice. It is primarily concerned with defining the “pool” of individuals that are eligible to be included in the metrics, as well as the details of who (or what) counts in defining each metric's components (e.g., the denominator and numerator for rate metrics). This element also includes the timing of reporting, the specification of reference periods, and other details of reporting policy that define exactly what data are collected and reported for each metric.

- *Goal-setting process*: This refers to the policies concerning performance goals, including whether or not goals are set for specific measures, the operating units for which goals are set (e.g., states, local workforce areas, program providers, educational institutions), and *how* the goals are set (e.g., negotiation, statistical adjustment model, grant targets, performance-based contract, etc.).
- *Consequences*: This element contains the policies concerning what happens when operating units achieve their goals for specific measures, as well as what happens when units fail or exceed their goals for specific measures. This includes policies defining success and failure across all applicable measures, as well as policies regarding sanctions for failure, incentive bonuses for exceeding goals, and technical assistance to units that need help improving their performance.

Figure 1. Elements of a Performance Management System



A Shared Accountability Framework

The following outlines a proposed framework for implementing shared accountability across the WIOA core programs (and potentially other programs beyond WIOA). Each of these levels of shared accountability corresponds to an increasing level of alignment among performance management elements, beginning with the common metrics in WIOA (level one) and culminating with aligned consequences based on pooled results for jointly managed programs (level six) (Figure 2). The levels of alignment among these elements represent greater levels of policy alignment across programs (the base of the pyramid in Figure 1). Shared policy objectives are the prerequisite for any of these levels of shared accountability. WIOA establishes shared policy objectives across the core programs, including an increased focus on the most vulnerable workers, expanded education and training options, and greater use of work-based learning.^{viii} These shared objectives establish a basis for more extensive integration of performance management policies.

Common metrics: This is the most basic level of shared accountability. Programs and funding streams in the shared framework use the same metrics to measure equivalent program objectives, such as obtaining employment following the program. These metrics are applied by each program to its respective participants, using different or similar rules to define the populations that qualify to be included and how the measures are applied. This level of shared accountability is implemented in WIOA for the six core programs. Alignment of the measures

communicates a consistent message to each program about the overall objectives. While the specific measures used, such as measurable skill gains or credential attainment, may be helpful in promoting services to low-income, lower-skilled participants, common measures by themselves are not necessarily designed to promote increased services to these persons.

Consistent metrics application: This level of shared accountability includes reporting results for the common metrics in a consistent manner across the programs and funding streams in the shared framework. For instance, a participant co-enrolled in two funding streams would qualify to appear in a particular metric’s numerator and denominator for both streams. If she obtained employment under one funding stream, she would obtain employment under *every* funding stream that supported her training. Consistent metrics application could reduce the disincentive to co-enroll low-income, lower-skilled participants by clarifying how results will be calculated under each funding stream. To what extent this level of shared accountability will be supported under WIOA is presently unclear, but it is implied by the common metrics.

Common approach to goal setting: This level of shared accountability includes a shared approach across programs and funding streams to how expectations are set for local program operators. For instance, whenever goals are being set for a given metric, each program and funding stream could use the same statistical model. WIOA requires the use of a statistical adjustment model for the core measures, suggesting a common approach to goal setting. The key model components include the adjustment factors (selected for their explanatory power and policy relevance), regression coefficients, and a departure point (which serves as a pivot point around which the model “adjusts” the expectation). The adjustment factors and departure point are critical, so coordination of these choices across funding streams for the models developed for each metric would represent a high level of policy integration. There are technical reasons why a single model based on data for all core programs might not adequately adjust the goals for individual programs. Whether a single model or multiple models are used, this level of shared accountability is intended to promote similar goals among programs that, regardless of the funding source, provide similar activities to similar participants and function in similar economic circumstances (as reflected in the models). This third level of shared accountability is only possible if the first two are already in place; otherwise, the results of the measures reflect different outcomes, even if they might appear to be equivalent. A common approach to goal setting would promote effective services to low-income, lower-skilled participants by reducing the disparity in goals between program operators serving the same or similar participants under multiple funding sources.

Figure 2. Levels of Shared Accountability

Levels (see text)		Separate funding-stream reporting	Pooled reporting for shared program elements
1	Common Metrics	X	
2	Consistent Application	X	
3	Common Approach	X	
4	Aligned Consequences	X	
5	Pooled Results for Shared Program Elements	X	X
6	Pooled Consequences for Shared Program Elements		X

Aligned consequences: This level of shared accountability includes a shared approach across programs and funding streams to assigning consequences for success and failure. This could include common definitions of what constitutes meeting, exceeding, or failing the goals for each measure, as well as equivalent definitions of overall success and failure (a summary assessment based on performance for all the applicable measures). It could also include policy alignment around sanctions for failure, awarding incentives for exceeding goals, and providing technical assistance to promote performance improvement. With this level of shared accountability, programs that receive funds from multiple sources would encounter an equivalent set of consequences for success and failure under each source. Any difference in consequences would reflect meaningful differences in the model-adjusted goals and results for the individuals served in each funding source, rather than inconsistent policies for how (or whether) consequences are imposed.

Aligning consequences would promote effective services to low-income, lower-skilled participants by removing the performance disincentive to co-enroll, because a program operator would not have higher goals imposed on it by co-enrolling its participants in multiple fund sources. Implementing this level of shared accountability would require adapting the consequences to address differences in governance models across the core programs. For instance, the types of consequences that are appropriate and feasible to implement for grantees at arm's length may be very different from the types of consequences that are appropriate to implement for employees. This level of shared accountability only makes sense if the first three levels are already in place, since programs must have equivalent goals, participants, and interventions for equivalent consequences to be fair.

Pooled results for shared program elements: This level of shared accountability involves pooling results for participants in program elements that are being managed on a shared basis. For instance, a local career pathway partnership (Figure 3) might implement one or more career pathways in a region; each of these would encompass multiple educational settings (e.g., adult education, postsecondary remedial instruction, postsecondary credit instruction, work-based learning) and multiple funding sources (e.g., WIOA Titles I and II, Carl D. Perkins CTE). In that context, results could be pooled for all participants that are being served within the career pathway. This would allow each funding source to determine success based on participants' *overall* career pathway results, rather than narrowly focusing on results attributable to the individual funding sources (although these narrower sets of results would still be known). In essence, the funding programs would agree to remove the reporting silos for each of their respective reporting systems in order to gain a more complete understanding of the career pathway's overall performance.

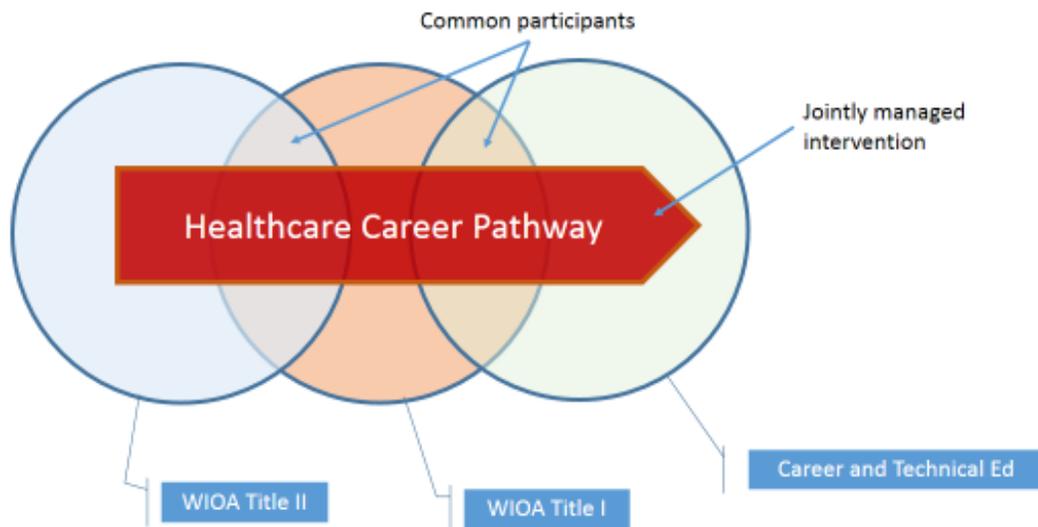
Under this level of shared accountability, each funding source would continue to report on—and only be responsible for—the results of its own participants. However, those outcomes would include the full set of results attained by each participant, including results attained in the career pathway before or after funding was provided. While management of a career pathway is the example used here, results could be pooled for any program intervention that is distinctly identifiable, has substantial numbers of participants receiving support from multiple funding streams, and represents a program activity that the funding stream managers agree is best implemented under a shared management model.

Pooling results for shared program elements would promote effective services to low-income, lower-skilled participants by removing the variable results across each of the funding sources that contribute to the shared program element; it would provide credit to each funding source for the full range of outcomes obtained by *all* funding sources. Pooling results would also facilitate improved performance management and continuous improvement of the shared program elements, such as a career pathway. Implementing level five of shared

accountability under WIOA would most likely require waivers of reporting rules by the federal and state agencies that administer each of the affected funding streams; it would also be dependent on the implementation of shared accountability levels one (common metrics) and two (consistent metrics application). While level five could be implemented even if the partners had not agreed to align their overall goal-setting processes (level three) or consequences (level four), this level of shared accountability would be most sensible if levels three and four were also in place.

Pooled consequences for shared program elements: This level of shared accountability represents an agreement among the funding streams to jointly hold the pooled program elements responsible for the results of the pooled activity, separate from (and in substitution for) the regular performance accountability requirements for each funding stream. Put simply, the funding streams and the local/regional partners would agree to set goals for the jointly managed program element (such as a career pathway); measure results on a pooled basis (level five); and implement joint sanctions, rewards, and technical assistance. In the fullest sense, partners would be jointly responsible for the results of the jointly managed program element—not just the results tied to their own funding contributions. Pooling the consequences for shared program elements would promote effective services to low-income, low-skilled participants. Creating a performance management environment that is separate from the regular funding streams would remove disincentives to integrate services and engage participants who have substantially higher need. This level of shared accountability would require various waivers of federal performance management policy, as well as the waivers of reporting requirements required for level five.

Figure 3. Jointly Managed Intervention Across Multiple Funding Sources



Questions and Issues for Further Discussion

CLASP is interested in exploring how a more extensive alignment of performance management policies could promote more effective services to low-income, lower-skilled participants in WIOA. How can we leverage WIOA's support for shared accountability toward these objectives? Important questions to consider in developing a broader shared accountability framework include:

1. Beyond common metrics, what other aspects of the WIOA performance management system could be aligned? What would this further alignment look like?
2. What other programs/funding streams outside of the core WIOA programs should be part of a shared accountability framework?
3. How would the alignment of performance management policies promote broader shared accountability?
4. How could the alignment of performance management policies promote more effective service to low-income, lower-skilled participants?
5. What would be the benefits of a greater level of shared accountability? What would be the disadvantages?
6. How can implementation challenges for shared accountability be addressed, such as reporting and data sharing, intake and enrollment, and case coordination? What other challenges must be addressed?

ENDNOTES:

ⁱ Tim Harmon and Neil Ridley, *Measuring Career Pathways Innovation: Potential Metrics and Background Questions*, CLASP, 2013.

ⁱⁱ Kisha Bird, Marcie Foster, and Evelyn Ganzglass, *New Opportunities to Improve Economic and Career Success for Low-Income Youth and Adults: Key Provisions of the Workforce Innovation and Opportunity Act (WIOA)*, CLASP, 2014, www.clasp.org/resources-and-publications/publication-1/KeyProvisionsofWIOA-Final.pdf.

ⁱⁱⁱ Fifteen percent is the authorized level for the set-aside. The current Continuing Resolution for WIA specifies an 8.75 percent set-aside for the governors.

^{iv} Bird et al., *Key Provisions of WIOA*

^v *Ready to Work: Job-Driven Training and American Opportunity*, The White House, 2014, http://www.whitehouse.gov/sites/default/files/docs/skills_report.pdf.

^{vi} Bird et al., *Key Provisions of WIOA*.

^{vii} *Shared Vision, Strong Systems: The Alliance for Quality Career Pathways, Framework Version 1.0*, CLASP, 2014, <http://www.clasp.org/resources-and-publications/files/aqcp-framework-version-1-0/AQCP-Framework.pdf>.

^{viii} Bird et al., *Key Provisions of WIOA*.