NDI – WIOA Transition to the Common Performance Accountability

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>> Okay, it looks like we're at the top of the hour and this is Nicky with the workforce innovation technical assistance center. Welcome to today's tools and resources.

So here you have everybody that is with you today. Doug, Rachel and Nicky. We're all here with the workforce innovation technical assistance center. Doug, do you want to say hi?

>> Doug: Hi, everybody!

>> Rachel: Hi, everyone, thanks for joining us.

>> Okay, all right, we're not going in long bios and most of you probably have talked to one or more of us and we want to get into the meat and potatoes of things. Let's go to the next slide and I'll turn it over to Doug who is going to talk about the last five years and what has happened through our WINTAC technical assistance and all of the work you have been doing.

>> Doug: Okay! Thank you so much, Nicky. So what has happened in the last five years? From some perspectives, it's been a very long five years but for others, it's gone way too fast. With WIOA, there were a number of changes that seriously rocked our world and established a focus for systems change for all of us.

Not the least was the change in how our success would be measured in terms of how individuals with disabilities we serve are included in the economy of the communities in which they live.

The WIOA performance measures, established for us a stronger alignment with the other core programs and some of the required ones as identified for operation through a one stop, American job centered system.

From a career pathways focus, there is emphasis on not just sustained employment and increased income in these measures, but there's a value added to each person that we serve in terms of increased skills and abilities as demonstrated in the measurable skills gains and credentials obtained.

These changes have impacted all of us in terms of service design and focus, staff preparation, case management, data collection and reporting and over all program evaluation. We have been challenged over this five year period to sometimes run with scissors a bit as we have addressed this together. While it's been necessary that many of the needed changes and guidance have come to us in stages as implementation of components of WIOA has come in stages. As a team with WINTAC, we look back over this period with a sense of appreciation for the leadership within the BRA agencies in your recognition of the components of the changes brought about with the new measures. As well as, your positive implications for customer service.

We have also enjoyed the connections with diverse leadership and expertise of the various teams within WINTAC and within the other national technical assistance centers while the changes have a critical relationship with the other WIOA activities related to community integrated employment, business engagement and the service alignment changes we face.

In the last five years, our technical assistance teams addressing WIOA performance has been able to make a connection with every VR state agency, whether in answering a question or being included in a facilitated discussion or community of practice.

To the provision of sustained, intensive technical assistance to realize the specific agency objective.

It is clear that while we are all diverse in technology and means to pull the information that supports our supporting and analysis, we appreciate the opportunity to address our challenges in transition through technical support and in the knowledge of lessens learned by others. Next slide, please.

We would like to briefly review with you, our team's focus in the area of performance accountability systems. Technical assistance in the area of our transition to the use of WIOA performance measures begins with an assessment of the agency's implementation of this.

With this, we review the guidance of our definitions and expectations related to performance. Often, we look to the core program partnerships to see where alignment will ease the agency burden and improve the flow of information that is important to us in our reporting, in our analysis of progress.

The WINTAC team has developed a question and answer, or FAQ information that addresses general performance in reporting questions. Which is posted for general use on our web portal at www. WINTAC.ORG. The focus on the structure of career pathway models in the provision of rehabilitation services is an important focus with regard to customer service and the performance measures directly reflect progress for agencies with career pathways.

The subject matter experts on this WINTAC team have supported vocational rehabilitation agencies on making this connection between the career service impact and performance.

The same holds true in the area of apprenticeship strategies. One of the strongest approaches to career pathways. The transition of agencies to a focus on WIOA performance includes steps in the areas of staff training and guidance, changes to policies and procedures, and the strengthening of internal controls which support an agency and relation to its use of data for program improvement.

The WINTAC team has supported state VR agencies in each of these areas where the intended outcome that all of these activities strengthen an agency's impact with the people it serves. Next slide, please.

As we consider the focus for the BR agencies and the WINTAC team and the area of supporting, support activities include analyzing capabilities to successfully report quarterly data and strategic planning.

Understanding and meeting the reports requirements of WIOA section 116, the rehabilitation act and uniform guidance. Technical assistance related to data validation and integrity, understanding RSA and joint sub regulatory guidance. Assessment of case management systems and adaptations need today successfully support the RSA911 or quarterly case management reports or the annual report ETA.

And analyzing data which has included interpreting anomalies, misinterpreters and staffers.

Breaking down the PY and quarterly data throughout all levels of the agency to be used in realtime program assessment in individual level of performance. Next slide, please.

This list of activities and focus for the WINTAC team has been developed over time to address the following noted changes for states and agencies. The transition to WIOA performance measures has been a challenge for the diverse case management systems used by VR agencies which very in terms of their capabilities and efficiencies and with regard to their transition.

As there's a human element in interpreting, capturing and reporting information, we have seen a wide range of challenges in staff capacity as the training and procedures and problems with staff turn over can play havoc with the best plans for new reporting responsibilities.

As each state has a different systems alignment with regard to how the VR agency interacts and works with the other core programs, and agencies through which we depend on some data required for performance reporting, some are more challenged than others.

It hasn't always proved to be a simple matter for some to establish the agreements necessary or processes for data matching to secure the information needed.

WIOA reporting requires common understanding and policy across the core programs at the state level which is not always easy. This can also lead to problems in getings source documentation required to support the confidence in our accuracy and in information tracking and reports.

Finally, in some instances, information is reported as title four information, even though there may be two separate VR agencies in a state. While in other instances, the two agencies will be reporting information separately. Next slide, please.

Like you, there's been quite a few lessoned learned by your technical assistant center in serving as a support to you through this transition. WINTAC is always looking to find more creative ways to present information in order to improve its usefulness to you.

For all, not all information in our resources is necessarily equal as guidance may be the same but operationally, there's differences in case management systems that are staffed and counselors to act.

To us, the difference in alignment, the procedures and legislation create different lenses in which each of you see this information which is a challenge sometimes for your TA center as well.

Guidance changes over time for all of us, for you definitely as portions of WIOA have been implemented in stages through which there's always new guidance that is being released.

As guidance changes, our support to you must be recalibrated. Meaning in some cases, what we might have suggested or recommended to you three years ago is no longer accurate or useful and it is important that we update the tools and resources available to you through our web portal. We have all learned a lot over the past five years of WIOA implementation and did our best to project where the greatest demands of support to you in the area of technical assistance would be.

However, we have had capacity issues as well and like many of the agencies we serve, we have experienced some turn over too. Despite all of our changes, there's a lot that we can take beyond us beyond WINTAC in terms of resources and tools. And we're very pleased to turn this presentation over to Rachel Anderson who will review these with you.

>> Rachel: Thanks so much, Doug! Welcome, everyone! Thanks so much. I know many of you are still working from home and some of you are transitioning back to offices and you have a lot going on right now so we hope you're all safe and healthy and just appreciate you being here and we know that many people couldn't join the live Webinar today.

We are recording. We'll have it posted on the website because most importantly, we wanted to make sure that this, everything that you might need is in one place and easily accessible for you. So hopefully we can accomplish that today. I want to, over the past five years like Doug has said, there's a lot that has happened as you know.

Some of these resources, or maybe even all of them, you probably know about. We want to make sure because we're sometimes things get lost in e‑mail and sometimes lost in translation or, you might forget that tool or resource exists that is still relevant for your WIOA implementation.

So we're just going to cover everything that happens to touch or is applicable to WIOA and section 116 for the performance accountability system.

Some of them I'll give you a little bit more information too so you can understand why it's relevant and these are also, as I get into this. I'm going to start off with the federal legislation.

Obviously everything lives on different sites so I did hyperlink throughout the presentation a direct link to either the federal register, the website, the WINTAC website or wherever else this document might live.

The most up to date versions so in case you don't have access to these, you can access the link in the presentation. And if you didn't even know you should access these, we want to make sure you knew where to find them.

So first, obviously linked to the workforce innovation and opportunity act. And then the rehab act of 1973 which is amended by title four of WIOA. So we know all of you have access to those but that is obviously the top tier of where all of these changes came from.

So that is the federal legislation. You have your federal regulations. This is not all of the regulations applicable to what you're doing and your program but again, this is where there's applicability to section 116 of WIOA.

So the first link is the final rule in the federal register for the VR program and I did add an additional link to just the VR services program part 361.

And then the second one, this is the one I want to focus on the most. Part 361, subpart D and E.

We found a lot of the agencies missed this. It's the VR program portion under part 361 but it actually lives in the WIOA joint rule. So subpart D and E go into detail. The information about sanctions, about estimated level of performance, about the performance indicators. And it gave a pretty well rounded overview and this was from August of 2016. So it did have a lot more information regarding the performance accountability system and we found a lot missed this because it wasn't part of 361 for the VR program.

Obviously you have a lot more information now and there's a lot of additional sub regulatory guidance that has been issued but I did want to make sure how everyone had a direct link to this because it is applicable to VR.

Next, I want to cover all of the sub regulatory guidance that has come out from RSA or the joint partners. On these you will notice I have the link to the actual guidance and then a date next to it.

Something I want you to keep in mind is that there are different versions of many of the sub regulatory guidance we're going to talk about. It is important to make sure you are functioning off of the most current version. We do, WINTAC and RSA when we're providing technical assistance or reviewing policies or guidance you're giving to staff.

Sometimes we find you have old language and things that are out dated that have changed. So just keep in mind that the dates matter. So it doesn't hurt if you're using one of these technical assistance circulars, that you double check the date and the version you're using.

So the first one is TAC20‑02. This is the most recent technical assistance circular that has come out regarding performance and it was ‑‑ everyone was anxious to get this guidance.

Keep in mind, this is joint guidance so they issued the exact same guidance and adult ed programs. So it goes over the details of negotiations and sanctions and you guys all experienced the initial stages of that as you were negotiating your MSG rates for program year 2020. So this one is a pretty detailed and technical assistance circular.

I myself, had to read it multiple times and I'm sure that you all have to access it depending on what you're implementing or what strategies you're using in your state.

TAC20‑01. It went through the combined state plans for program year 20 to 2023. Obviously this time has passed but there was a section in there that did talking about your requirements for meeting section 161 and I believe, appendix one where you had to fill out your estimated level of performance of MSGs and your negotiated levels for MSGs.

So even though the time has passed, that's still a good one to review because you're going to have to go through that all again in two very short years for the rest of your performance indicators.

Tech 1901, I will say this one is one currently, at least from my perspective, I'm looking at this one almost every single day as we're providing TA to states.

So big reminder on your requirements for data validation. This is another one with joint guidance for all of the core partners. It provides you guidance of your state and program requirements for validating the data for section 116 and all of the performance indicators.

I get asked all of the time how you can document an MSG or what is allowable source documentation for enrollment. These things are outlined pretty clearly in tech 19‑01. So if you haven't spent a lot of time in this document, it might not fill VR‑ish. And just remember, that's a joint guidance. So if you have any questions or need any support with this TAC, please don't hesitate to reach out.

TAC17‑05, this came out in 2017 so it's pretty old too. It did share the requirements for submitting your annual report or the ETA91‑69.

Also, on our website and also on NCRTM, there's a recorded how to video on submitting the annual report. So as agencies have turn over or as different things happen in your agency, you do have access to do some additional materials not just this TAC.

Under TAC ‑‑ this is my favorite TAC and it's because it's the most user friendly, the best plain language. It's a pretty good read and it is again, joint guidance so it discusses all of the titles on all of the core programs under section.

So it does fully describe all 6 performance indicators and a lot of the attachments, if you haven't looked at a attachments, they're really great too. They give you things like, the calculations for performance. Some of them are a little bit out dated at this point. But it does give you information on calculations. It defines some of the performance. Indicator terms and it talks about exclusions for performance. So there's a lot of great attachments in this document as well.

And then lastly on this slide, it's TAC 17‑04. This also came out in 2017. This is something I'm continually sending to states. The more you evolve your are practices and post exit reporting and figuring out your UI matching, your Swiss matching and reporting who is working after exit, the more states are trying to figure out, how do we capture everybody? How do we capture the individuals who are self‑employed or are working somewhere that does not fit into the state UI system.

So just a reminder, TAC17‑04 is the guide that explains to you, if you're going to do any post exit follow up and for employment information. If you're going to do that outside of the UI system, this sets the parameters for those supplemental wages. So if you're having staff do any follow up. If they are gathering IRS forms, if you're sending out surveys or getting pay stubs, this really directs how you need to use that information and what information is allowable to use to report for the performance indicators.

This next slide is more sub regulatory guidance. This is going to be policy guidance and other pieces of guidance you need to be aware of.

Most of you were involved in the 911 or the case management system. You know about PD1903 P. This came into effect. This is your new one.

I attached a link to the PDF and the file format. They are both user friendly. I use them both for different things. I wanted to make sure you have access to both if you didn't.

Remember that this policy directive made quite a few changes in our reporting. Not only for the performance indicators but also for things like preemployment transition services, how we report the date of IPE and a few other things. So it's really important to make sure you understand those changes so you can direct training to staff and update any of your policies. I still gave you a link to policy directive 1604. This is the old version RSA911. I personally like to use both of them.

In 16‑04, there was a lot more definitions on what the intent of some of the reporting requirements were and how they are supposed to be used. A lot of them are relevant. So if you are having a hard time with PD19‑03 because it's not as descriptive, it doesn't hurt to go back to 16‑04 and get the pieces together. Not all is applicable but it does help to understand the full picture of the reporting system over time.

And then PD16‑03. This is the original, back in 20‑16, just talking about the requirements for the unified and combined state plans. So a couple other things to keep in mind.

Well, not all of them but they're pretty out dated as well but still relevant. So if you can remember back in 2016, the federal partners issued joint guidance on data matching to facilitate WIOA performance reporting and evaluation.

This was for mostly PI, data from education partners so that is pretty relevant when you talk about data matching.

Also, there was an FAQ on the RSA911. There's some good questions in there. Some may be out of date but I just wanted to make sure you have it as well.

The last two here I wanted to update you on is the Swiss clearinghouse and then also the department of labor and department performance resources. I always recommend that you go to RSA or the VR tools first, but there's lots of good reasons to go to ETA's website as well.

They have a lot of training material and also, you can start looking at some of the performance, like your annual reports or the performance levels of your core partners in your state.

It will give you good information because they're ahead of us in a lot of this reporting. They have a lot more data over time than we do in VR. So it's a good opportunity to see, well, gosh, what is our title one youth program, measurable skill gain rate?

What are they working with? What is their credential rate? And then it will start to give you an idea of how your other core programs are functioning when you're analyzing your own data. There's also additional things on here like, the reporting specs. There's the wage conversion chart also in TAC17‑01. There's a lot of good information Webinars, resources can and tools.

Again, they are more directed towards labor but some of them are very valuable that you may be able to adapt into your system.

I just wanted to make sure you have access to all of those. So next, I want to get you through the performance tools that are developed through RSA and the other partners and the WINTAC. So under RSA, in addition to the regs and sub regulatory guidance. They have put out some great tools. I just wanted to make sure you have them and you know what they're there.

So they have a MSG rate performance excel file and this is for year program 20 and 21. This one is a really great tool. It does break down ‑‑ let's see.

I'm pulling it up to give you detail. This one gives you a lot of information about the different programs, all of the MSG rates and the performance level for everybody. So this is kind of a quick document to see where your state is. What your baseline data was. And what your estimated Sam levels were.

So this is a really great tool for that. The statistical adjustment model, this one gives you more. So for any of the data geeks or anyone who has a responsibility that is returning reports or maybe, running the model in your own agency trying to assess where you are at or where you're going to be over time.

This gives a break down of all of the state data as well. But it gives you the parameters for the statistical adjustment model. So remember, it's just about MSGs but that is the only model that the VR agencies are using right now. And then the RSA correction procedures.

This one is very important for you, especially those who are responsible for submitting the quarterly reports. If you have to make changes or corrections to your full reports or errors for a few participants, this gives you a break down of all of the requirements that do you have.

Depending on what the correction you need to make is, there are different correction procedures. So just make sure you or whoever is responsible for this has that information. There's also a cross over of changes.

This is a good one as well. This covers all of the changes from the RSA911 in 16‑04, to the RSA911 in PD.

This one, this is an old document as well. It was issued in March of 2017. This is the guidelines for supporting guidelines for the case documentation support.

This document, though it's still relevant, it is really out of date. It is before the changes in 16‑04 or 19‑03. It is really useful because it gives you examples of source documentation for VR requirements. So under VR, you have to have supporting documentation for things like, the application date, the eligibility date, wages, and a variety of other things. So that's in addition to the.

So I wanted to make sure you had this. Another good place to go for this information is in the MTAG, the monitoring technical assistance guide. Under the case review document, it has some of the updated data elements but similar examples of required source documentation. So there's quite a few different places that you can go for that on the VR program side. And then lastly, as you know for a couple of years now, RSA has been issuing quarterly data dash boards for all of your RSA911 information.

If you're not using these, I strongly encourage that you do because it is really really good information. Some agencies because of the challenges of their case management system, that is all they have. They can't run any cool dash boards or a lot of data and they are really struggling with their systems so sometimes this is the only report they have access to.

A lot of you are also trying to replicate these in your state so you can use them realtime. Also, trying to replicate it so it goes all the way down to the staff level.

So counselors can see where they're performing according to what RSA is looking at. So just a really really great tool. So the next section is here.

So for those who don't know what it is, it's a federal work group that RSA facilitates and there's a bunch of different state partners and we're trying to create some tools that are useful for states, especially because some states don't have a lot of resource for data an lytics.

Maybe they don't have FTEs right now for those positions and states need some help with data analysis. So one of the activities this group is working on is creating national tools that are already built that you can use to analyze where you're at. The only one that has been issued is the MSG tool. This is really cool because it's the only document right now that is out for everybody to use that breaks up all of the programs and the MSG data.

So the other two that we talked about, it's your statewide level. Most of you probably know by now, that when we're talking about the WIOA performance indicators, it's a title 4 rate. For those who have a blind and a general program, the rates are always going to be combined for both of your agencies.

This MSG tool, we broke it down so you can have access to the blind agency data, the general agency data and also the total data for title four so you can see it from all perspectives. Right now this tool only has program 17 and 18. I hope that since program 19 is finished, we can add the data so you can compare yourselves to other programs that are like yours, other blind agencies like you or just nationally where you compare.

The other tool we're working on is a employment tool and a transition services tool. The same idea. We want to give you data nationally by program so you can see where you're at, compare it to other like agencies and just get more assistance with data analytics. So now I want to go to the WINTAC tools and everything you have access to as you continue your implementation efforts.

I do want to say the majority of these tools are in partnership with RSA. You will see it on RSA as well as WINTAC.

As our grant wraps up on September 30th, I think we'll have these all posted on our website. At least through December, probably longer. Just pay attention to where they move to. They might move to a new website for the new technical assistance centers.

They also may move to the RNC ‑‑ website and also RSA's website. For right now, I have them all links to WINTAC.

Just again, pay attention to it as long as there's something you want or save these documents. So first of all as you know, issued recently, a case service report series.

As states were preparing for the implementation, back in October the WINTAC and RSA, we started issuing trainings on different topics on how to implement the new 911.

So we start it in October of 19 and will finished around March of 2020.

It has eight different trainings that talk about everything you need to know about implementation. Also, later on, we decided to add a bonus training. We realized that the training really only spoke to the case management system folks, the policy program staff, and it really didn't talk to the VR counselors so we added a bonus training for VR counselors to explain to them the big picture and why they need to know about the RSA911 and how important their reporting in their own case management system is when it comes to data, performance measures and grant funding and all of that. So if you haven't seen it, we think it's a really great resource and hopefully you do to. We also have an implementation checklist. So if you are still trying to implement this new RSA911, especially as we get closer to the first quarter, feel free to look at the implementation checklist and make sure you hit on the most important changes that you're going to have to update things at your program level.

Next, we have quite a few guides that are specific to WIOA accountability. One of the most recent ones we worked on is calculating the VR performance for MSG. This is really important. Even though you have your negotiated levels of performance for MSG. Once this first year wraps up, there's a lot of other things that are going to happen to calculate your true performance and your actual performance rate.

So take a look at that. It gives you examples of calculations and hopefully it's in plain language enough, that you can understand what is happening in the next year and years to come. We also have our credit attainment guide.

This is to help you understand those performance measured requirements and it's a checklist as well as you're trying to figure out these programs in your state, meet the definition of a credential skilled gain.

They also have examples of what do not count and what do count. And then we have this effectiveness and serving employer cross walk. Depending on how your state has decide to measure or report, you should look at this. Depending on the two different approaches you have chose. Some VR services for employers don't align with the position of the WIOA and make sure anything you're reporting to your labor partner meets the definition under this guide. It's a cool crosswalk to say, here's what VR does and what the service that will count under WIOA.

A couple other things that we have developed recently is this reason for exit tool. This is one of my favorite guides because under this, it's updated for this. So it has all of the most recent updated information in it. This is a really crucial time in point when you're closing cases and you're choosing how to close somebody's case. It can determine whether you have to follow up with them for six quarters after exit. Or whether they're excluded from the performance measures.

This is a really great, one stop tool to see how you close the case, which reasons for exit are included in the performance measures, which ones are not and then also an example for each of the reasons for exit.

So as you're doing your training and you make sure that counselors know when to choose this reason or that reason, they can have more information to make the best decision at that time. So it's a really great tool. We have also got this, this is more for administration but we have a VR agency reporting deadline. This is just a summary of all of the reports due for VR agencies.

For those in transition, you probably have seen this. We have zone it in partnership with out team. This is just another crosswalk with the performance indicators for WIOA and also, IDEA transition part B indicators.

Later, we also added these programs so this is another addition there.

And then we have also got a guide for register's apprenticeship. So we know a lot of you are diligently trying to partner with apprenticeships and increase the opportunities for people with disabilities in the VR program. This is another guide. As you're starting to engage more in an apprenticeship, we wanted to make sure you know how to report it as a training service and also, credential and measurable skill gains.

So you can start reporting correctly from the get go, rather than fixing things later on. Hopefully that's helpful to you.

And then we have a couple FAQs. So on our website, we have general reporting FAQs. We also developed a full FAC on how to do the transition services. Also, project search. We have got a lot of questions about project search, do the work based learning experiences count for MSGs. It's those kinds of questions.

That might be a helpful document. Also if you don't have project search in had your state, it may be applicable to some of your other unique programs so take a look at it even if you don't have project search.

Something else I want you to be aware of. You're going to get an e‑mail today or tomorrow likely. From RSA and probably from the WINTAC as well.

We are sending out a new FAQ to clarify some of the reporting requirements for MSGs. So look for that. It's going to teach you how to implement data element 401 which is taking participants out and put them back in if they reenroll.

There's some examples and we answer quite a few questions with that. So keep a look out for that one. We also will get it posted for our website very shortly. Just an announcement of one final tool and training we are going to issue.

So by September 30th, hopefully much sooner than that, we are going to be issuing two self‑paced training that are CRC trainings for counselors. One is going to be on the performance accountability system. This is really great because it defines the performance measures and we also use client scenarios and kind of explain the counselor's role in a huge based system.

How can they use their counseling and guidance skills to help increase the likelihood that people are working second and fourth quarter after exit. Or what types of services can they support to help increase the performance measures. It's a great way to explain it.

Then, we have a second one, it's all through the lens of the counselor and some ethical considerations as we're talking about performance and this implementation and kind of changing the way we have viewed success in VR.

Any day now, we hope to get it out. Here is a link of where it's going to be posted on the WINTAC website. So just keep checking and we will have it there as soon as possible.

A couple of things just in closing. I just wanted to share a couple of things we're very proud of. You guys have been working so hard and really making huge strides in meeting these requirements.

We're still not there yet. Years out from having this performance thing going out.

I just want to congratulate for all of your resources that you. Now, just continue to keep doing everything that you can and make the changes and updates as efficiently as you can.

It's great to hear data becoming common language in states. So a lot of you, you know, with your policies and procedures and your internal controls and with anything you're implementing in your state, data is part of the conversation and that's just really really exciting to see.

Same with internal control. We heard a lot of agencies say, we have a new policy and training. What is our internal control? How are we going to prove this happens and that counselors understand.

It's exciting to see you move to the next phase of implementation. Also, it's just really exciting to see you put all of the puzzle pieces together. Getting data down to counselor level. Really breaking up what administration needs to know. What the data folks need to know. How fiscal ties into all of this and how you truly use data to show the value of the VR program and all of your great outcomes. We're very proud of the work you're doing in that arena as well. And then every single day you start to increase your understanding and your level of partnership with your core partners.

I think that's just a really huge accomplishment, especially because some of you have challenges in that area as well. So just keep up the good work!

A couple of the last things. We just want to make a few recommendations moving forward.

So WINTAC, we're focused on the implementation of the system. As you're moving past that and as WINTAC ends, we did want to just give you a few recommendations as you move forward.

Doug mentioned this a little bit in his section but, you know, even if WINTAC gave you guidance three years ago, it might be out of date. I might tell you something totally different today because we have more information. Things have changed over the last three to five years. So we would just recommend that you continue to review your policies and procedures.

Time understanding and updates. For example, the new 911 requires that you are going to have to update your policies and procedures and training. You can't just implement something and think you're done because there's so many moving parts under section 116. So just keep it in mind. Also, just keep learning and adapting. More things are going to happen. We're going to have more targets. We're going to have more negotiations.

Also, many of you are getting new case management systems or trying to understand your current case management systems. So we have seen a lot of challenges that you're experiencing with your case management systems and honestly, some of you have your home grown systems, even though that's challenging as well, some of you know way more about the RSA911 than some of the agencies that use purchased systems.

So it really varies and we would just encourage you to keep learning, make sure you truly understand where your case management system intersects with the RSA911 and just keep doing your best.

Also, continue to increase your partnerships, you'll always hear us say things like, gosh, how do your title two partners do it? How do they define it? What is their source documentation?

We would encourage you guys to just keep asking yourselves that as well.

If this is a common measure or if this is something that all of the core programs have to experience, the more you work with your partners, the better, the whole system will become.

And then also, just do a true analysis of where you have strengths and where you have weaknesses. As you know, a lot of agencies are really killing it at preemployment transition services. Other agencies are really still struggling with defining and implementing that. It's the same with WIOA performance accountability. So you might have one area that you feel really confident in and 7 others you are still trying to figure out.

Please asking each other for help. Please keep asking us for help if there's anything we can help you with last minute, we're happy to do that. Just keep doing great work.

I'm going it turn it over to you. That's all I have.

>> Great, I was having trouble finding the mute button. So okay, thanks so much! Thank you everyone. I haven't seen any messages or comments. Shannon had put contact information in there for UGS. So please feel free, if you have follow up questions, and you want us to connect with you, walk you through any of the rules.

Or if you have any additional questions. Hopefully it's been useful because you know, that's a wealth of information, Rachel and so many different tools and so many things that are all full. And you know, as we said, this period of WINTAC, we're available for a little more than a month now. It will help out.

We're not sure as far as the future goes with support for the VR agencies in the moment but we're glad you can use all of the tools and information that you have got today.

Thanks again, Rachel! Thanks for Shannon for the wonderful tech assistance in the background and thanks Doug!

Here is our names, contact information, and phone number. I'll leave it up for a little bit so if you want to jot it down. Thank you again, so much! Thanks, everyone! Bye!