



*Are you ready for Common Performance Measures (CPM) Implementation?
A checklist for State VR Agencies*

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 **Section I – Understanding and Evaluating the Common Performance Measures (CPM)**

1. Have you discussed strategies and expectations for collecting and reporting the Common Performance Measures with your state core partners?

- a. Do each of the core partners understand timelines, federal reporting expectations (e.g., State Vocational Rehabilitation Agencies (SVRA) reporting expectations to RSA, etc.)?
- b. Do each of the core partners have a joint understanding of the operational meanings of the data elements, and why the data is needed?
- c. Has the state agreed on which Effectiveness in Serving Employers measure they will be collecting and reporting?
 - i. Does the state have the necessary data sharing agreements in place to collect this data?
 - ii. Is the IT infrastructure in place to calculate this measure?
- d. Have you discussed strategies, checklists and/or definitions of CPM-related reporting with the core partners (e.g., local approved credential programs, measurable skill gains definitions, etc.)?
- e. Have the core partners agreed on expectations and procedures for amending the Unified/Combined State Plans and the State Annual Report?
- f. Have the core partners discussed how separate agency performance ratios will be combined into one statewide performance ratio?
- g. Though SVRAs are in their baseline reporting year, have you discussed these new measures with your Title I colleagues about their experiences regarding similar reporting measures under the Workforce Investment Act (WIA)?
- h. Are the core partners using a unique identifier that promotes sharing client data needed for reporting? Is the state using a data warehouse or similar system to share data, required for reporting, across programs?
- i. Have the core partners discussed collecting data for individuals co-enrolled in the core programs?
 - a. What is the strategy for collecting this information?
 - b. Does the state have strategies in place to co-enroll? This may be particularly important for SVRAs in Order of Selection.



2. What is the State Vocational Rehabilitation Agencies' (SVRA) level of knowledge and understanding of Common Performance Measures?

- a. Have you reviewed the performance accountability guidance issued in [RSA-TAC-17-01](#)?
- b. Have you conducted training on the CPM in order to understand the short- and long-term implications of these new measures?
 - i. Examples: Counselors, community partners, State Rehab Council, vendor partners, etc.
- c. Do you have a strategic plan for training, implementation, policy and procedure amendments that includes both timelines and roles/responsibilities?
- d. Does your case management system have a designated place for collecting, documenting, tracking and reporting of credential attainment and measureable skill gains?
- e. Have you run reports on previous closure information to gain a better understanding of where you may be regarding the new CPM?
 - i. Example: Analyzing data from previous fiscal year end reports can help you look at some aspects that could assist with CPM planning and implementation; increased education level at closure (26's and 28's), wages at closure (26's), hours worked at closure (26's), case service dollars spent on education compared to educational level at closure (26's and 28's), etc.
- f. Because the Department of Labor programs have been reporting on similar performance measures during WIA, have you discussed how they used the measures for program evaluation, setting targets and lessons learned? These approaches may not all work for the VR program, but could get you started with ideas to avoid starting from scratch.

3. Have you determined how you will use the reporting system to evaluate your program and processes over time?

- a. What do you need to evaluate in addition to the CPM?
- b. Will you continue to track outcomes based on the old standards and indicators in order to report progress over time to your state officials and legislature?
- c. What strategies have you discussed to implement the CPM and roles and responsibilities regarding program evaluation?
 - i. Who are your national partners for program evaluation (e.g., The Summit Group, CSAVR, etc.)?
 - ii. Do you have the staff resources (e.g. staff time, staff expertise, etc.) necessary to conduct identified evaluations?
- d. Though it is not a requirement under the CPM to track outcomes for potentially eligible students who receive pre-employment transition services, have you discussed strategies for tracking these outcomes to show the impact of these services?



4. Have you accessed all of your partners available to assist and support you with questions, concerns, needs and implementation?

- a. Who can you contact?
 - i. [Rehabilitation Services Administration](#) (RSA) State Liaison
 - ii. [Workforce Innovation Technical Assistance Center](#) (WINTAC)
 - iii. W.I.O.A. Core Partners
 - iv. Labor Resources -- [Workforce GPS](#)
 - v. [Council of State Administrators of Vocational Rehabilitation](#) (CSAVR)
 - vi. Other -- Federal, State, Local partners



Section II – Operational Components of Implementing the CPMs

1. Is your case management system ready to collect the [PD 16-04 911](#) data elements?

- a. Are the data elements built into your system for counselors to use?
 - i. Do you have written procedures for how documentation is collected and stored in a case file?
 - ii. For elements that require documentation to be uploaded and tracked, does your case management system have this ability?
 - iii. For systems that do not have this ability, are there expectations and requirements for filing in hard case files?
- b. Have counselors been trained on all of the new elements?
 - i. Have counselors been trained on expectations for completing the new 911 data elements missing from open cases as of July 1, 2017?
 - ii. Have counselors been trained on the importance of timely case documentation and accuracy due to quarterly reporting requirements?
 - iii. Have counselors been trained on which data elements require third party documentation, along with policy and procedures?
- c. Have you created internal controls necessary to validate the accuracy of collected data?
 - i. Do you have written policies and procedures that describe the methodologies and timelines for collecting and determining accuracy of the data?

2. Is your case management system ready to report the [PD 16-04 911](#) data elements?

- a. Are the data elements built into your system and tested against the Management Information System (MIS) and/or RSA edit check table?
- b. Does your system have the ability to report quarterly?
 - i. Using the MIS reporting system, SVRA's must report 45 days after the end of each quarter (e.g. PY17: 1st Qtr. July 1-Sept 30, 2017 -- Report due Nov. 15, 2017)?
- c. Have you created strategies and steps necessary to check errors prior to submitting quarterly reports to RSA?
 - i. For example, if errors are found in counselor reporting, what steps will the agency take in order to correct errors prior to submitting reports?
 - ii. For example, if errors need to be corrected for elements that cannot be changed after reporting, what steps will be taken to fix errors with RSA prior to annual report?
- d. Have you created internal controls necessary to validate the accuracy of collected data to eliminate reporting errors and limit returned reports from RSA?
 - i. Do you have written policies and procedures that describe the methodologies and timelines for reporting and determining accuracy of the data?



3. Due to some wages not reported through Unemployment Insurance (UI), SVRAs will need to implement policies and procedures for gaining Supplemental Wage Data. Are you ready to implement the collection and reporting of Supplemental Wage Data?

- a. Have you reviewed the joint Guidance on the Use of Supplemental Wage Information issued in [RSA-TAC-17-04](#)?
- b. Have you discussed with your core partners how they gather and document supplemental wage data?
- c. Have you created policies and procedures for documenting and reporting supplemental wage guidance?
- d. What is your strategy for training staff regarding policies and procedures in order to limit errors and increase accurate reporting?
- e. Have you created internal controls necessary to validate the accuracy of collected data?
 - i. Do you have written policies and procedures that describe the methodologies and timelines for collecting and determining accuracy of the data?

4. What is your strategy for collecting open case data on Measurable Skill Gains (MSG) and reporting this information on a quarterly basis?

- a. Have you discussed with your core partners how they plan to gather and document MSG?
- b. Have you implemented policies and procedures regarding the definitions, requirements and timelines for collecting and reporting MSG?
- c. What is your strategy for training staff regarding policies and procedures in order to limit errors and increase accurate reporting?
 - i. Do your staff understand the connection between credential attainment and MSG, and the documentation requirements for agency credit?
- d. Have you discussed how you will collect and document MSG data?
 - i. For example, gathering this information through individual client and counselor relationships, entering into data sharing agreements, both, etc.
 - ii. Is the IT infrastructure in place to collect this data?

5. What is your understanding of the Statistical Adjustment Model (SAM) and its use in SVRAs' negotiations?

- a. Do you know which years are considered baseline indicators and when negotiations will begin using the SAM?
- b. Do you understand the four factors for consideration in the negotiation process?
- c. Do you understand the factors that determine success and failure for performance?
- d. Because SAM is new to SVRAs, have you discussed with your Title I partners their experience in using this model of negotiations under WIA to help prepare you for possible expectations of its future use?
- e. During the baseline reporting years for SVRAs, guidance regarding SAM will be published by RSA. Until that time, SAM information is located at [Department of Labor's Employment and Training & Administration website](#).



Section III – CPM Agreements and Additional Considerations

1. The federal joint partners are developing the State Wage Interchange System (SWIS), which will enable states to share wage data across states. Consider the following:

- a. Have you discussed with your local UI agency their intentions of using the SWIS, and what is needed in order to become a signatory on the agreement?
- b. Have you discussed the use of the SWIS with your local core partners?
- c. Have you discussed with your surrounding states (or any states you foresee needing wage data) their intentions of using the SWIS?
- d. Have you discussed strategies for gaining wage data with surrounding states, from which you may need wage data, if the SWIS is not an option or agreed upon mechanism?
 - i. For states who will not be using the SWIS, have you discussed individual data sharing agreements with them?
- e. Do you fully understand what the SWIS is and what it is not?

2. Have you entered into a data sharing agreement with your local UI Compensation agency, required to gain access to wage data for quarterly reporting?

- a. Does this agreement provide individual data necessary for 911 reporting, or only aggregate data?
- b. What is the error rate for this data? Is it guaranteed to be accurate, or can agencies plan for possible errors in data?
- c. What is the cost to the SVRA for accessing this data? How will payment be made?
- d. Does this agreement discuss confidentiality and privacy for each partner, and what is allowable for use of the data?
- e. Have you determined how the parties in the agreement will ensure compliance, including permitting federal administering agencies to monitor for compliance, as appropriate?
- f. Does your case management system have the ability to match data with the UI agency, or will a new system be needed (or a third party system to streamline agency data)?
- g. Do you have a strategic plan in place to gather data that will NOT be accessible through the UI agency?

3. Have you determined how and why you need to gain access to federal and/or military employment records?

- a. The University of Baltimore's [Jacob France Institute](#) has previously been the location for housing the Federal Employment Data Exchange System (FEDES) wage data. They will no longer hold this contract, which will make it difficult for states to have access to federal and military wages through a single data match.
 - i. Have you determined how you will gather federal and military wages without a data match? (e.g. creating policy and guidance on supplemental wage data using verification through HR departments or follow up on clients who have exited in federal or military employment, etc.)
- b. Have you discussed with your core partners whether you will gather this data using the same methodologies or through individual program guidance?



4. Have you discussed or entered into data sharing agreements with your local education agency (both secondary and higher education) or other agencies in order to access credential attainment data?

- a. What data are you able to access through these agencies?
- b. Is there a lag in data, similar to 2nd quarter lag in UI data? When can you expect to receive credential attainments through higher education data matching?
- c. Have you considered data sharing agreements with other agencies in order to collect this data (e.g. National Clearinghouse)?
- d. Have you provided training to VR counselors on what types of credentials count for this measure and how to document attainment with open cases?
- e. Does your case management system have a designated place for VR Counselors to document credential attainments that match post-exit data elements needed for reporting? This can increase validity of data while documenting open cases in real time.
- f. While documenting credential attainments on open cases, does your system allow you to pull this data annually, for evaluation purposes, rather than just as post-exit data?
- g. Do you plan to gain credential attainment up to one year after exit, solely through data sharing agreements, or do you have a plan for client follow-up post-exit?
- h. Department of Labor programs were required to collect credential attainment under WIA. Have you discussed their strategies and data sharing agreements that proved to be successful for collecting this data under WIA?