
DWD Policy 2017-15, Change 1: Adult Education Data Collection and Reporting

To: Indiana's Workforce System
From: Indiana Department of Workforce Development (DWD)
Date: August 20, 2025

PURPOSE

This policy provides guidance on the collection and reporting of data for state and Workforce Innovation and Opportunity Act (WIOA), Title II, and adult education programs.

CHANGE 1 SUMMARY

This policy has been updated to align with OCTAE Memorandum 17-6 and OCTAE Memorandum 19-1, issued July 10, 2025.

RESCISSION

DWD Policy 2017-15 *Adult Education Data Collection and Reporting*

REFERENCES

- Workforce Innovation and Opportunity Act
- WIOA Title II Adult Education and Family Literacy ACT (AEFLA)
- OCTAE Memorandum 17-6 *Guidance on the use of Supplemental Wage Information to implement the Performance Accountability Requirements under the Workforce Innovation and Opportunity Act (WIOA)*¹
- OCTAE Memorandum 19-1 *Guidance for Validating Jointly Required Performance Data Submitted under the Workforce Innovation and Opportunity Act (WIOA)*²
- U.S. Department of Education, Office of Career, Technical, and Adult Education, *National Reporting System*
- DWD Policy 2013-07 Change 1 *Adult Education Program Standards*

CONTENT

The Workforce Innovation and Opportunity Act (WIOA) requires the Department of Workforce Development (DWD), Division of Adult Education, to annually report specified data and information on Indiana's adult education programs to the U.S. Department of Education, Office of Career, Technical, and Adult Education (OCTAE). OCTAE has established

¹ <https://www.ed.gov/media/document/guidance-use-of-supplemental-wage-information-implement-performance-accountability-requirements-under-wioa-36962.pdf>

² <https://www.ed.gov/media/document/memo-guidance-validating-jointly-required-performance-data-submitted-under-wioa-36966.pdf>.

National Reporting System (NRS) measures that address the federal accountability requirements of WIOA Title II, which are collected by DWD and submitted to OCTAE. Adult education (AE) providers that receive federal and/or state funds from DWD must collect, report, and submit required NRS and state data electronically using the InTERS system. Each AE provider must have up-to-date internally created policies and procedures for data collection and reporting on file.

InTERS Training

All AE staff with access to InTERS must attend the required InTERS trainings during the program year. Failure to send AE staff to trainings may result in revocation of InTERS system access for untrained AE staff.

Required Data Reporting

Specific information shall be collected and entered for each reportable individual and adult education participant in InTERS.

1. Demographics
 - a. Race/ethnicity (self-identified);
 - b. Gender (self-identified);
 - c. Date of birth;
 - d. Highest grade completed;
 - e. Highest educational level completed (degree earned);
 - f. Country of origin; and
 - g. Whether WIOA adult or youth.
2. Status (at entry)
 - a. U.S. citizenship;
 - b. Workforce eligibility;
 - c. Employment status;
 - d. Long-term unemployment status;
 - e. Incarceration status;
 - f. Current school status;
 - g. Temporary assistance for needy families (TANF) status;
 - h. Adult Education status;
 - i. Job Corps status;
 - j. Vocational Rehabilitation status;
 - k. Wagner-Peyser Employment Service status;
 - l. YouthBuild status; and
 - m. Geographical status (whether residing in urban or rural area).
3. Barriers (at entry)
 - a. Foster care youth status, homeless status, ex-offender status;
 - b. Low income status;
 - c. English Language Learner (ELL) status;
 - d. Basic literacy status;
 - e. Cultural barriers (self-identified) status;
 - f. Single parent status;
 - g. Dependent(s) status;

- h. Displaced homemaker status;
 - i. Dislocated worker status; and
 - j. Migrant/seasonal farm worker status.
- 4. Program Specific Information
 - a. Date of program entry;
 - b. Date of program exit;
 - c. Date of most recent career service;
 - d. Whether received training;
 - i. Date training received;
 - ii. Type of training received; and
 - iii. Eligible training provider program of study.
- 5. Student Participation Metrics
 - a. Contact hours;
 - b. Program enrollment type;
 - c. Educational gains as determined by TABE and/or TABE CLAS-E pre- and post-testing;
 - d. Participant secondary credential or High School Equivalency (HSE) attainment;
 - e. Date student released from incarceration (if applicable); and
 - f. Indication of parent or guardian signature for participants under the age of eighteen (18).³

Integrated Education and Training (IET) and Integrated English Literacy and Civics Education (IELCE)

AE programs that receive funding for IET or IELCE programs have additional reporting requirements.

- 1. IET/IELCE completion date;
- 2. IET/IELCE participant drop date (if participants leave the program);
- 3. Name of the certification attempted; and
- 4. Certification attainment.

Social Security Numbers

DWD requires providers to request Social Security Numbers (SSNs) or Individual Taxpayer Identification Numbers (ITINs) from both participants and reportable individuals. SSNs and ITINs are critical for DWD to utilize data matches to obtain data for federal reporting purposes. The last four digits of either SSNs or ITINs can be accepted instead of the entire number. Participants and reportable individuals will be informed that disclosure is not mandatory and is requested only for the purposes of data matching. Providers may not deny individual services in the event the individual refuses to disclose their SSN/ITIN.

³ Collection of a parent signature for minors is only necessary for those who attend classes. Some minors who qualify as reportable individuals do not require a parent signature.

Employment and Wage Data Collection

The performance accountability indicators listed below apply across the six core WIOA programs, including Title II, Adult Education.⁴

- Employment Rate – Second Quarter after Exit;
- Employment Rate – Fourth Quarter after Exit;
- Median Earnings – Second Quarter after Exit; and
- Credential Attainment.

Federal guidance recognizes that matching a participant's SSN against quarterly wage records is the most effective means for determining employment status and earnings for a program participant. However, a quarterly wage record matching will not be possible in all circumstances. It is encouraged to develop a supplemental wage data collection process for individuals who do not provide SSNs or for whom wage records are not available, as a means for programs to collect data for the calculation of performance indicators as required by WIOA.

If a participant does not have an SSN or ITIN in the data system, state policy is to conduct supplemental employment and wage data collection through the Indiana Technical Education Reporting System (InTERS). Acceptable forms of supplemental wage and employment information include, but are not limited to the following:⁵

- Tax documents, payroll records, and employer records such as:
 - Copies of quarterly tax payment forms to the Internal Revenue Service, such as a Form 941 (Employer's Quarterly Tax Return);
 - Copies of pay stubs (minimum of two pay stubs); or
 - Signed letter or other information from an employer on company letterhead attesting to an individual's employment status and earnings.
- Other supplemental wage records:
 - Post-Exit follow-up for the purpose of collecting employment and wage information (self-reported) from program participants;
 - Detailed program staff case notes with employment and wage information obtained from the employer;
 - Automated database systems or data matching with other partners with whom data sharing agreements exist; or
 - Self-employment worksheets signed and attested to by program participants.

States may only use self-attestation or self-reported supplemental wage data information from participants through follow-up if all efforts to collect other allowable source documentation have been exhausted.

Self-Attestation means a written, or electronic/digital declaration of information for a particular data element, signed and dated by the participant. The Departments⁶ broadly

⁴ Per OCTAE Memo 17-6 and under section 116(b)(2)(A) of WIOA.

⁵ OCTAE Memorandum 19-1.

⁶ U.S. Departments of Labor and Education (collectively, the Departments).

interpret what is considered an electronic/digital signature. Electronic signatures or submissions from the participant such as an email, text, or unique online participant/exiting response are considered an electronic signature or verification; it must be participant generated and traceable to the participant. Participant-provided self-attestation documentation must be maintained.

Time Period for Collecting Supplemental Wage Information

The table below summarizes the times when data match or supplemental wage data are to be collected.⁷

Performance Indicator	UI ⁸ Wage Data Becomes Available	Collection of Supplemental Wage Information May Begin
Employment Rate – Second Quarter after Exit	During third or fourth quarter after exit	Beginning third quarter after exit
Employment Rate – Fourth Quarter after Exit	During fifth or sixth quarter after exit	Beginning fifth quarter after exit
Median Earnings – Second Quarter after Exit	During third or fourth quarter after exit	Beginning third quarter after exit
Credential Attainment – within One Year after Exit	During second or third quarter after exit	Beginning second quarter after exit

The timing for collecting supplemental wage information may vary based on whether the agency knows or expects that UI wage data will not be available for a participant following the exit of the program. The need for supplemental wage information for some individuals may not become apparent until no match is found in direct UI wage records or other sources. However, when it is known that UI wage data will not be available for individuals due to a lack of SSN or ITIN, or for participants for whom it is known that their income is generated through entrepreneurial or self-employment, programs do not need to wait two quarters after the close of the second or fourth quarter full quarters after exit to begin supplemental wage and employment data collection. The optimal time to collect supplemental wage information is as soon as possible following the close of the second and fourth full quarters after exit.

DWD recommends that programs communicate with students upon program entry the requirement for wage and employment information at the second and fourth quarters following program exit. It is also recommended that participants are reminded of this requirement as they prepare to exit the program, if the exit is predictable based on student outcomes. While this reminder is applicable to all participants, it is especially important for participants for whom it is known that UI wage data will not be available.

DWD recommends that supplemental data is collected at minimum on a quarterly basis. If it is determined that a more frequent than quarterly follow-up would be more convenient or yield better results, a monthly, weekly, or on-going schedule may be implemented.

⁷ OCTAE Memorandum 17-6.

⁸ Unemployment Insurance.

Schedule for Data Entry

DWD strongly recommends that data be entered into InTERS on a weekly basis. Excessive time between data collection and entry significantly increases the likelihood that data will be lost and/or inaccurate data will be reported. Timely data entry will allow both program staff and DWD to analyze data on a regular basis and use that data for program planning and continuous program improvement.

While programs may determine their own schedule for data entry, DWD requires that all monthly data be entered by the 10th of the consecutive month.

Attendance Hours

Participant attendance shall be entered within twenty-four (24) hours of the actual class time, and no later than the end of the week. Every effort shall be made to enter attendance within twenty-four (24) hours of class time.

Data Accuracy and Validation

Per OCTAE Memorandum 19-1, programs must adhere to state validation processes that ensure data accuracy and integrity for all federally required elements. DWD reviews electronic program records available through the InTERS system are conducted monthly, on or directly after the tenth of the month. Programs will be notified of records that have missing or incorrect data. Programs will have until the next data review deadline (following tenth of the month) to correct records in error.

DWD state staff will provide data validation training for programs at least annually. This training will outline source documentation⁹ required for common data elements, review error description and reconciliation processes, and provide current state and federal policy around data collection and validation. Training will also be provided on monitoring protocols, consistent with 2 CFR § 200.328, to ensure that program staff are following the written data validation procedures and will describe applicable corrective action if those procedures are not being followed.

All programs shall maintain back up data documentation, including attendance, student exit, and proof of parent/guardian signature if the participant is under eighteen (18) years of age and in accordance with DWD Policy 2013-07 Change 1 regarding student folder requirements.

Analysis

DWD requires programs to monitor student progress and attendance through the active use of InTERS data. DWD recommends that monitoring occur on a daily basis. DWD further recommends that results are shared with program staff on a regular basis.

⁹ See OCTAE Memorandum 19-1, Attachment I for source documentation requirements.

ACTION

AE Programs must comply with this policy and all Federal guidance. Programs found to be out of compliance with any part of the policy may be monitored and subject to a corrective action plan.

EFFECTIVE DATE

Immediately.

ENDING DATE

Upon rescission.

ADDITIONAL INFORMATION

Questions regarding the content of this publication should be directed to policy@dwd.in.gov.