

***Summary Report: Second Quarter 2015 Meeting  
Combined Advisory Group  
Wage Record Interchange System (WRIS) and  
Wage Record Interchange System 2 (WRIS2)***

*Convened by conference call on June 24, 2015 (2:00 pm EDT) from the Employment and Training Administration (ETA), U.S. Department of Labor, Washington, DC.*

***Meeting Highlights:***

**I. Welcome and Remarks**

Karen Staha, Chief of the Division of Strategic Planning and Performance for the U.S. Department of Labor's Employment and Training Administration Office of Policy Development and Research (OPDR) welcomed state participants to the WRIS and WRIS2 Advisory Group Second Quarter meeting and introduced Federal representatives from ETA and Employment and Training Legal Services (ETLS) attending with her. Ms. Staha noted that implementation of the Workforce Innovation and Opportunity Act (WIOA) would begin on July 1, 2015. Although the majority of WIOA provisions take effect at that time, the performance accountability provisions are effective on July 1 of 2016. The Comment Period for the WIOA Notice of Proposed Rulemaking (NPRM), published in the Federal Register in April, closed on June 15, 2015. More than 1000 comments were submitted for consideration in developing the Final Rule.

During July, Ms. Staha indicated that the Departments of Labor and Education would publish a notice in the Federal Register announcing the joint information collection request for performance reporting to fulfill the requirements under Section 116 of WIOA. This will represent a collaborative effort among staff from ETA and the Department of Education's Office of Career Technical, and Adult Education (OCTAE) and the Rehabilitation Services Administration (RSA). The information collection request (ICR) will include an individual participant layout, with common definitions and data elements, for use by states for reporting. The ICR also will include the accompanying specifications, and the templates to be used by the States and local areas for the annual performance report, and the template to be used by Eligible Training Providers for their reports to the State, which will then make that available to the Department of Labor.

In late June and early July, Ms. Staha noted that ETA also plans to release TEGs (Training and Employment Guidance Letters) related to the Adult and Dislocated Worker Program under WIOA and Wagner Peyser, as amended by WIOA, as well as for Eligible Training Provider (ETP) eligibility and dissemination of the ETP list.

Ms. Staha reported that ETA recognized that revisions would be required for the existing data sharing agreements to reflect the requirement of WIOA and noted that she planned to have a Work Group organized and operating as soon as possible. For full WIOA guidance and status documents, Ms. Staha noted ETA's public dedicated Web site: [www.doleta.gov/wioa](http://www.doleta.gov/wioa). In addition, reference materials are available on the public Performance and Results Web site: <http://www.doleta.gov/performance/>

## II. Adoption of the First Quarter 2015 Summary Report

The Draft Summary Report of the First Quarter WRIS-WRIS2 Advisory Group meeting on March 19, 2015 had been distributed to the Advisory Group for review. The March conference call meeting included an overview WIOA, the data sharing agreements, WRIS2 membership, training opportunities, and an update for technical operations. No comments were received on the draft, and Ms. Staha requested a motion to adopt the Summary Report as distributed. South Dakota made the motion and Pennsylvania seconded. The Summary Report was approved as written without objection.

## III. WRIS2 Membership and Operation Status

Heather Parker (ETA) and John Glen (OR), chairman of the WRIS2 Work Group welcomed the two newest state members of the WRIS2: Michigan and Washington. Both have signed the WRIS2 Data Sharing Agreement and initiated the SUIA ICON testing program. The WRIS2 exchange now has 38 members, 37 states and Puerto Rico. Ms. Parker noted that the new grantees for the Workforce Data Quality Initiative (WDQI) soon would be announced. To be eligible to receive a WDQI grant, states needed to have signed the WRIS2 Data Sharing Agreement. The WDQI grants have a significant emphasis on application of the funds to help prepare data systems for WIOA implementation. In closing, Ms. Parker extended her appreciation to the WRIS2 Work Group for its continuing leadership and commitment of time. The Work Group includes Clinton Flowers (MO), Adam Leonard (TX), Drew Maxfield (UT) and John Glen.

Ms. Parker briefly discussed the WRIS-WRIS2 Confidentiality Compliance and Incident Response WebEx held for state SUIA, PACIA and IT representatives on April 16, 2015. At the request of the Washington State PACIAs, a WRIS 101/Refresher was presented on April 20. In March, a WRIS2 101/Refresher had been held with the South Carolina PACIA. Ms. Parker noted that ETA is pleased to provide the WRIS or WRIS2 Refreshers for any state staffs and asked that requests be sent though [WRIS@dol.gov](mailto:WRIS@dol.gov). Understanding that states are focused on transitions for WIOA implementation, no additional Town Halls or WebEx training have been scheduled for the summer months. The February WRIS-WRIS2 Town Hall had included presentations addressing data element validation as well as the eligible training provider list (ETPL) and the related consumer report card (CRC). Ms. Parker noted that requests for autumn Town Halls topics or WRIS-WRIS2 101/Refreshers are always welcomed and should be e-mailed to ETA through [WRIS@dol.gov](mailto:WRIS@dol.gov).

## IV. Quarterly Report on WRIS and WRIS2 Operations

Amanda Gohl, Xerox, provided the quarterly technical overview for WRIS and WRIS2 operations. The 2<sup>nd</sup> Quarter Technical Report was distributed in advance of the meeting and is also available on the Xerox dedicated PACIA Web site. Ms. Gohl reminded participants that July 6 is the due date for SUIAs to submit data for the Distributed Database Index (DDBI). The new data will be available for PACIA cross match on July 13, 2015. Ms. Gohl briefly discussed the annual security audit that will be conducted at the data center. In response to a question from Bruce Olinsky (NH) regarding any potential impact on WRIS operations during the audit, she confirmed that there would be no impact. Ms. Gohl noted that Xerox undergoes an annual certification process.

## V. Additional Business and Discussion

Ms. Staha turned the Advisory Group discussion to questions and comments from the representatives. Alabama's representative inquired if the language in the WRIS2 Agreement related to Third Party Entities (TPEs) will be included in revised versions of the WRIS or WRIS2 Agreements and if Alabama would be able to participate in the revision process. The California representative noted that California shares a similar concern regarding the WRIS2 Agreement language related to Third Party Entities. Ms. Staha and Ms. Parker briefly discussed that a Work Group comprised of state SUIA and PACIA representatives is being established to revise the WRIS and WRIS2 Agreements and indicated that the direct participation of Alabama, as well as others, is welcomed. The SUIA and PACIA Work Group will seek the input of other states and will engage the WRIS-WRIS2 Advisory Group to comment on the proposed revisions.

The Texas and Oregon representatives clarified that Third Party Entities never receive identifiable data because the WRIS2 Agreement requires that the respective PACIAs prepare only aggregate statistical reports; and, they referenced the Agreement provision for Aggregate Statistical Reports in Section VII. C. 1. Operation of WRIS2 (page 9), as well as the provision in Section IV. Definitions, A. (page 3) for aggregate data: *“Aggregate Data” is “wage data” that has been stripped of any information that would identify the individual(s) and employers to whom the data pertains, including but not limited to, name and Social Security Number (SSN) or Federal Employer Identification Number, and that have been aggregated into a group(s) containing no fewer than three records, provided however, that nothing herein shall prevent a PACIA from observing a more stringent aggregation policy with regard to its own use and reporting of data.*

Lois Zuckerman (ETLS/SOL) advised that the WRIS2 Agreement at Section IV. Definitions, O. (page 4) provided a definition of Third Party Entities: *“Third Party Entities (TPE)” are any public body, agency, or private career school required by law to meet state and/or Federal performance measures. A PACIA, or its agent or consultant, cannot be designated as a TPE.* Patricia Mertens (ETA/OWI) noted the expressed state concerns about the Agreements' requirements regarding 20 CFR 603 for confidentiality and the data shared under WRIS and WRIS2. Ms. Mertens clarified that aggregate data is not subject to the provisions of 20 CFR 603 because it does not contain personally identifiable information (PII).

Ms. Staha expressed appreciation for the Advisory Group representatives' active participation in the discussion and sharing of state concerns for data confidentiality. She noted that in addition to reviewing the state and Advisory Group comments, counterparts within the U.S. Department of Education would also be looking at potential revisions to the WRIS agreement.

In response to a question raised by the Tennessee representative that requested context for a HUD inquiry about a pilot project, Ms. Parke explained that HUD, on behalf of its grantees, was conducting research that falls under the WRIS2 Agreement's allowable purposes. HUD Job Training grantee performance reports are included within the WRIS2 Agreement at Section VII. C.1 (page 9) under approved purposes and, as such, a HUD grantee could enter into a Third Party Agreement with a participating WRIS2 PACIA in order to obtain aggregate information for the purposes of their respective required performance reports.

In discussing a question regarding CRIS (Common Reporting Information System), Ms. Parker indicated that ETA has a grant Memorandum of Understanding with the Kansas Department of Commerce; Kansas, as a PACIA, queries the Distributed Database Index (DDBI) for the national or discretionary grant programs permitted under the WRIS Agreement in Section VII and returns the aggregate information to the ETA grantee programs for purposes of performance reporting.

The North Carolina representative inquired if there will continue to be two Data Sharing Agreements in operation, one for WRIS and one for WRIS2. Ms. Staha indicated that the SUIA and PACIA Work Group would review and recommend how many agreements would be needed to meet the requirements of WIOA. The Texas representative noted that the FEDES Agreement has been updated to include authority under both WIA and WIOA.

In response to questions regarding the new requirements for Eligible Training Providers and the use of WRIS, Ms. Parker requested that specific inquiries be e-mailed through [WRIS@dol.gov](mailto:WRIS@dol.gov) in order for ETA to provide more detailed information for use in the interim. Regarding WRIS2, a question was raised whether or not a Third Party Entity Agreement needed to be signed before a state could provide aggregate information to universities and colleges. Ms. Parker confirmed that a TPE Agreement was a requirement of the WRIS2 Agreement prior to the sharing of aggregate data, and requested that follow-on questions regarding TPEs and their related Agreements be e-mailed through [WRIS@dol.gov](mailto:WRIS@dol.gov).

In closing the discussions, Ms. Staha thanked the representatives for participating in the WRIS and WRIS2 Advisory Group quarterly meeting. September 10, 2015, Thursday, was proposed as the date of the Third Quarter conference call meeting. In the interim, representatives were asked to raise questions on any WRIS or WRIS2 topics through [WRIS@dol.gov](mailto:WRIS@dol.gov).