



DISTRICT OF COLUMBIA

OFFICE OF THE STATE SUPERINTENDENT OF

**EDUCATION**

## District of Columbia Narrative Report Fiscal Year (FY) 2019-20

### I. State Leadership Activities

The Office of the State Superintendent of Education, Adult and Family Education (OSSE AFE) supported the following required State Leadership Activities in fiscal year 2020 (FY20).

#### A. Alignment of adult education and literacy activities with other one-stop required partners to implement the strategies in the Unified or Combined State Plan as described in section 223(1)(a).

In FY20, OSSE AFE worked with the Workforce Investment Council (WIC), Grant Associates, Inc. (the District's One Stop Operator), the Department of Employment Services (DOES), the Department on Disability Services (DDS), the Department of Human Services (DHS), the University of the District of Columbia (UDC) and other key partners to achieve the strategic objectives outlined in the District's WIOA Unified State Plan, including the alignment of adult education and literacy activities with the other one-stop required partner activities. OSSE AFE, in collaboration with these agencies, expanded the District's efforts to create uniformity in intake, assessment and program referral practices across DC government agencies via Comprehensive Adult Student Assessment System (CASAS) eTest implementation, screening of adults for learning disabilities, and DC Data Vault implementation. The DC Data Vault is a transactional data system that helps District agencies streamline, coordinate and integrate the provision of education, training and other related services to District residents. The DC Data Vault: 1) facilitates the referral of District residents to and from agencies for services; 2) allows staff to schedule and register customers for assessments; 3) filters programs based on customer interests, preferences and needs; 4) links customers to programs and monitor their receipt of services; 5) allows staff to upload, maintain and share customer eligibility documents; 6) provides access to customer information and notifications to key staff; 7) generates customer profiles; 8) tracks customer progress and outcomes; and 9) facilitates cross-agency communication and collaboration for services for District residents.

In collaboration with the WIC, OSSE AFE co-facilitates monthly DC Data Vault workgroup meetings with the representatives from each of the WIOA core partner agencies, the DC Council's Committee on Workforce Development, and the One-Stop Operator, to strategize ways to enhance service delivery to District residents. The DC Data Vault has been used by staff at each of the four American Job Centers/One-Stop Centers in partnership with OSSE AFE providers since 2016. OSSE AFE provided professional development and technical assistance to the staff at DDS and DHS in FY19 to facilitate the integration and use of the Data Vault at the DDS headquarters and three DHS Family Resource Centers. The DC Data Vault is managed by OSSE AFE in collaboration with Literacy Pro Systems, Inc.

#### B. Establishment or operation of a high-quality professional development programs as described in section 223(1)(b).

In FY20, OSSE AFE in collaboration with the University of the District of Columbia (UDC), offered professional development workshops and technical assistance on WIOA, Integrated Education and

Training (IE&T), program design, and strategic leadership to sub-grantees to increase their capacity to offer high-quality IE&T, and supportive and transition services to District residents. Other professional development offerings included Comprehensive Adult Student Assessment System (CASAS) Implementation, CASAS eTest Coordinator and Proctor Training, Supporting Adults with Special Needs, Literacy Adult and Community Education System (LACES), DC Data Vault, Career Coach, Virtual Job Shadow, and other related trainings.

In FY20, OSSE AFE continued its partnership with the UDC to offer the Graduate Certificate in Adult Education Program (GCP) to 21 adult educators to prepare them for certification and/or state licensure in Adult Education. The GCP provides adult educators with an opportunity to engage in either one or two, three-credit course(s) over a 15- to 24-month period for a total of 24 credits. Nine adult educators completed the program and earned a graduate certificate. UDC also offers the Master of Art (MA) in adult education program for which the graduate certificate program is aligned and credits may be applied. Five adult educators enrolled in the MA program in FY20 and two students who enrolled in the program in FY19 earned an MA degree in FY20.

**C. Provision of technical assistance to funded eligible providers as described in section 223(1)(c).**

OSSE AFE provided technical assistance to sub-grantees and local program providers during check in sessions at OSSE, local program site visits, meetings, webinars, telephone calls and emails. Technical assistance topics included 1) program design, implementation, and evaluation; 2) intake and assessment; 3) curriculum and instruction; 4) student recruitment, retention, and persistence; 5) student progress and outcomes; 6) data collection and management; 7) budget and finance; and 8) accountability and reporting as well as other related topics. Additionally, the AFE team provided technical assistance to sub-grantees to support their implementation of recommendations for continuous improvement in the areas of 1) student recruitment, retention, progress and involvement; 2) instructional models and methods; 3) program management and leadership; and 4) data collection and reporting.

**D. Monitoring and evaluation of the quality and improvement of adult education activities as described in section 223(1)(d).**

OSSE AFE monitors sub-grantees to evaluate local program performance monthly via check-in sessions at OSSE, local program site visit, or desk review. Additionally, the AFE team conducts classroom observations, folder samplings and fiscal monitoring verification activities quarterly. Local program providers are required to submit monthly statistical reports and quarterly narrative reports with evidence that includes: student roster report, NRS fundable Student Roster Report, National Reporting System (NRS) Tables, CASAS Current Year Pre- and Post-test Assessment report, student core goal attainment reports, and other related documents.

Local program participation in an annual final monitoring review and the development and implementation of a continuous improvement plan are also required. The OSSE AFE Monthly and Quarterly Reports, Final Monitoring Tool, classroom observation tool, and student surveys continue to be used to assess the effectiveness of local programs and the improvement of adult education activities as described in section 223(1)(d). The performance data acquired from local program providers via the monitoring process is also used by the state to address the specific professional development, technical assistance, and/or resource allocation needs of local program providers and to work with local program providers to develop and implement plans for continuous improvement.

**E. As applicable, describe how the state has used funds for additional permissible activities described in section 223(a)(2)**

In FY20, OSSE AFE worked with its providers and partners to help strengthen the alignment between adult education, postsecondary education and employers. OSSE AFE staff and sub-grantees participated in informational sessions and meetings with the Workforce Investment Council, Workforce Innovation and Opportunity Act (WIOA) Partner Agencies, Career Pathways Task Force, Board of Trade, Chamber of Commerce and other organizations to identify potential partnerships that can assist the state and local program providers in offering high-quality Integrated Education and Training services to District residents.

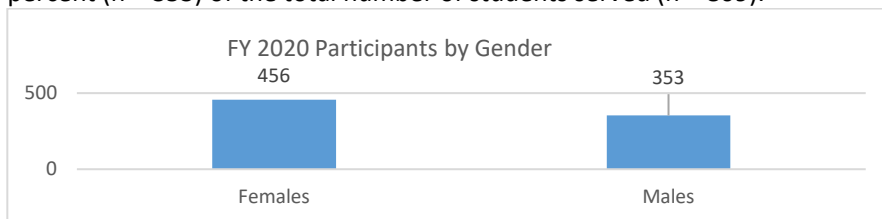
**II. Performance Data Analyses**

In FY20, OSSE AFE awarded funding to 10 sub-grantees to implement the new Integrated Education and Training service models introduced in the FY17 grant competition. The models included the provision of adult education and literacy, workforce preparation, and training services for a specific occupation or occupational cluster to 1,000 District residents for educational and career advancement. However, due to the COVID-19 pandemic the state did not achieve its projected enrollment of 1,000 District residents, as it had done in the past. In total, 814 adult learners received services in OSSE AFE funded programs in FY20 compared to 1,144 students in FY19. This reflects a reduction of 28.00 percent (n=330 students). Of this number, 809 learners met the National Reporting System (NRS) guidelines of having a valid assessment and 12 or more instructional hours in the program year to be reportable to the US Department of Education compared to 1,062 in FY19. This reflects a reduction of 23.00 percent (n=253 students). Five adult learners engaged in one to 11 instructional hours in FY20, compared to 82 students in FY19. This reflects an increase in student persistence in FY20 in comparison to FY19.

While OSSE AFE had worked with its providers to develop and implement an Action Research Distance Learning Plan to offer IE&T services to DC residents at a distance, it took time for the state to: 1) survey local program providers, their staff and students to assess their capacity to offer and engage in Distance Learning, 2) analyze the survey data and provide additional fiscal resources so that local program providers could obtain the necessary human, material and technological resources needed for staff to provide services at a distance and students to engage in services at a distance; 3) obtain national, state and local guidance to develop COVID-19 protocols for local program providers and partners; and 4) schedule and offer professional development and technical assistance to strengthen local program provider’s capacity to offer services at a distance, including Comprehensive Adult Student Assessment System (CASAS) assessment services remotely to District residents so that students could be appropriately referred and/or enrolled in programs based on their educational functioning levels and so that the state and local program providers could continue to collect and maintain high quality data in accordance with the National Reporting System (NRS) for accountability and reporting purposes.

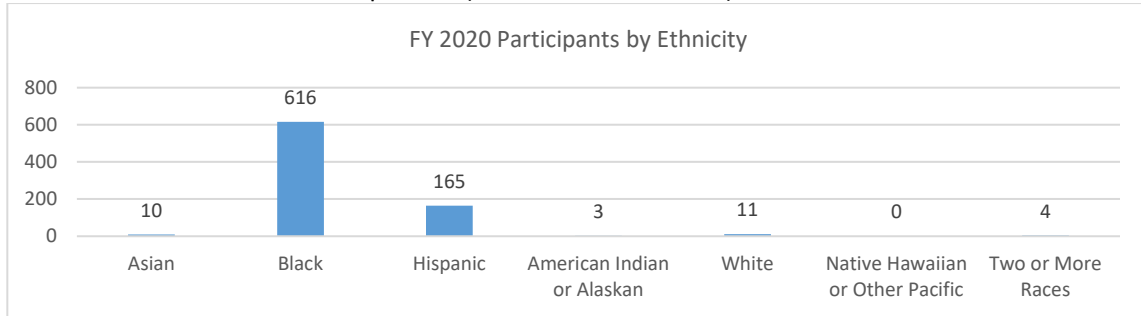
**DC FY20 Participants by Gender (NRS Table 2)**

In FY20, female learners represented 56.00 percent (n = 456) and male learners represented 44.00 percent (n = 353) of the total number of students served (n = 809).



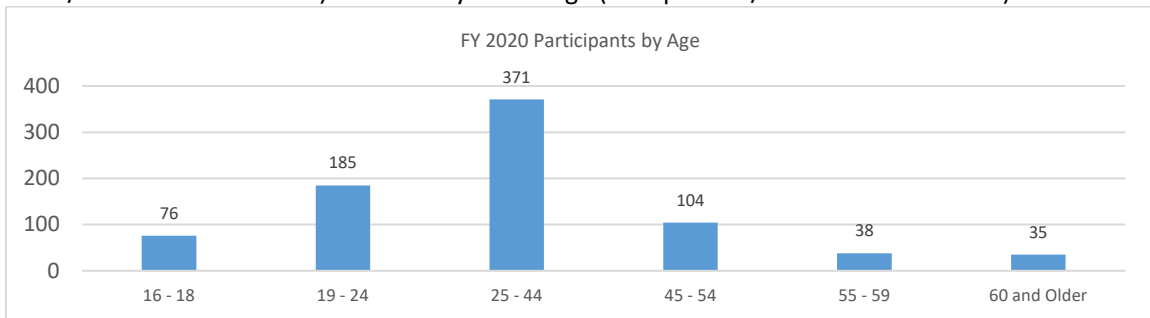
**DC FY20 Participants by Ethnicity (NRS Table 2)**

At 76.00 percent (n = 616 of 809 students), black or African-American participants comprised the single largest ethnic group of learners served; Hispanic or Latino students followed at 20.00 percent (n = 165 of 809 students). The percentage of American Indian, Alaskan, Asian, or white participants and persons with Two or More Races was at 4.00 percent (n = 28 of 809 students).



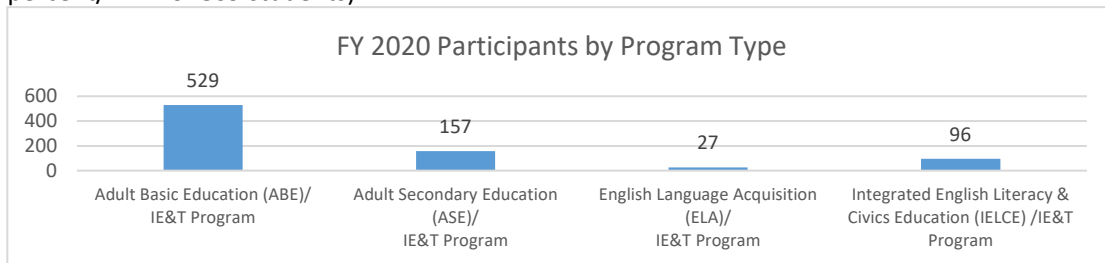
**DC FY20 Participants by Age**

Consistent with past years, the largest single group of learners served was students ages 25-44 (46.00 percent/n = 371 of 809 students). The second largest group was students ages 19-24 years (23.00 percent/n = 185 of 809 students), followed by learners ages of 45-54 (13.00 percent/n = 104 of 809 students). The smallest groups of learners served were at opposite ends of the age continuum and included students 60 years of age and older (4.00 percent/n=35 of 809 students), 55-59 years of age (5.00 percent/n=38 of 809 students) and 16-18 years of age (9.00 percent/n=76 of 809 students).



**DC FY20 Participants by Program Type (NRS Table 3)**

In FY20, of the total number of learners (n = 809) who met the NRS guidelines, students in Adult Basic Education (ABE)/Integrated Education and Training (IE&T) Programs comprised the single largest group by program type (65.00 percent/n = 529 of 809 students). The second and third largest groups by program type was Adult Secondary Education (ASE)/IE&T Programs (20.00 percent/n = 157 of 809 students), followed by Integrated English Literacy and Civics Education/IE&T Programs (12.00 percent/n=96 of 809 students). The fourth and smallest program type was English Language Acquisition/IE&T Programs (3.00 percent/n=27 of 809 students).



**DC FY20 Measurable Skills Gains by Entry Level (NRS Table 4)**

**Adult Basic Education (ABE) Participants by Entry Educational Functioning Levels**

Of the total number of ABE participants, the largest number of students entered at ABE Level 4 (35.00 percent/n = 260 of 735 students) followed by ABE Level 3 (23.00 percent/n = 172 of 735 students) level. The smallest number of participants entered at ABE Level 1 (7.00 percent/n = 50 of 735 students).

**English as a Second Language (ESL) Participants by Entry Educational Functioning Levels**

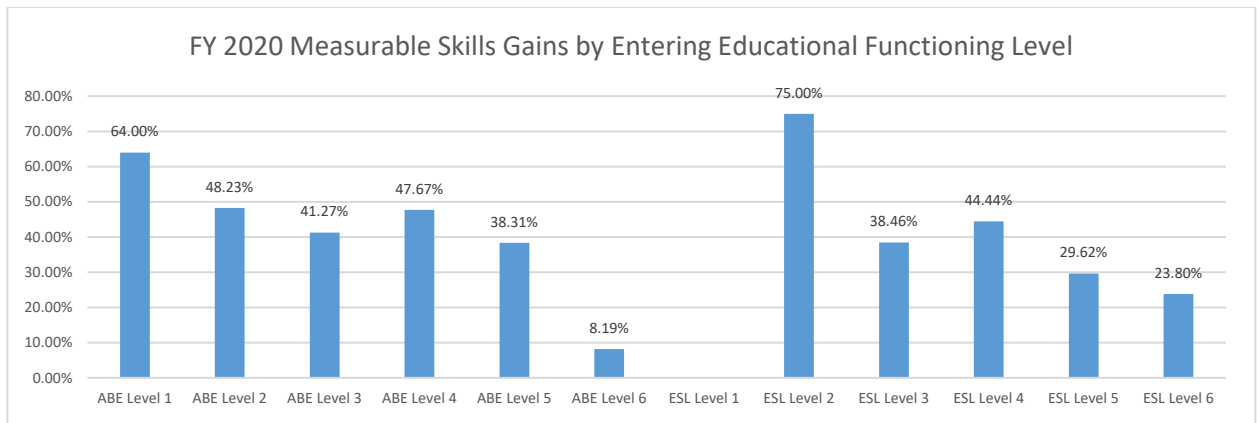
Of the total number of ESL participants, the largest number of participants entered at ESL Level 5 at (37.00 percent/n = 27 of 74 students) followed by the second largest number of participants who entered in ESL Level 6 (28.00 percent/n = 21 of 74 students). The smallest number of ESL participants entered in ESL Level 2 (5.00 percent/n = 4 of 74 students).

Adult Basic Education (ABE) Levels			English as a Second Language (ESL) Levels		
Entering Educational Functioning Level	Total Number Enrolled	Total Percentage Enrolled	Entering Educational Functioning Level	Total Number Enrolled	Total Percentage Enrolled
ABE Level 1	50	7%	ESL Level 1	0	0%
ABE Level 2	85	12%	ESL Level 2	4	5%
ABE Level 3	172	23%	ESL Level 3	13	18%
ABE Level 4	260	35%	ESL Level 4	9	12%
ABE Level 5	107	15%	ESL Level 5	27	37%
ABE Level 6	61	8%	ESL Level 6	21	28%
<b>Total</b>	<b>735</b>	<b>100%</b>	<b>Total</b>	<b>74</b>	<b>100%</b>

**Measurable Skills Gains by Entry Level**

For FY20, OSSE AFE negotiated a measurable skill gains performance target of 44.00 percent for all ABE and ESL Educational Functioning Levels (EFLs). This target represents the proposed percentage of adult learners making a measurable skill gain (e.g., achieving an educational functioning level gain, acquiring a secondary school diploma or its equivalent, or exiting a program below the postsecondary level and enrolling in postsecondary education and training during the program year). While OSSE AFE did not achieve its target of 44.00 percent, 41.88 percent (n=338) of students enrolled in an OSSE AFE-funded program had achieved a measurable skill gain as of the third quarter of the program year, when Covid-19 required programs to suspend place-based services on March 13, 2020 and remote CASAS assessments were not available until after the end of the FY20 program year. If the pandemic had not occurred and the state and local program providers could have continued to administer pre-and post-tests to students and collect and report on measurable skills gains without interruption throughout the remainder of the third quarter and the fourth quarter of the program year as well, the state would have exceeded its target of 44.00 percent for FY20, as it did in FY19 - (49.80 percent). The state will continue to work with local program providers to offer pre- and post-assessment services to students remotely, in place-based settings using Personal Protective Equipment (PPE) and social distancing and/or via a hybrid of the two approaches so that the state can meet or exceed its negotiated target of 47.00 percent for measurable skills gains in FY21.

The chart below reflects the percentage of adult learners who made measurable skills gains. Students at ABE Level 1 had the highest percentage of measurable gains at 64.00 percent, followed by students at ABE Level 2 (48.23 percent), and 4 (47.67 percent). Students at ESL Level 2 had the highest percentage of measurable gains at 75 percent, followed by students at ESL Level 4 (44.40 percent) and ESL Level 3 (38.46 percent).



**DC FY20 Core Outcome Follow-up Achievement (NRS Table 5)**

Per WIOA, the state did not have performance targets for NRS Table 5 as this was a year for the collection of baseline data. While it is important to note that there is a lag time associated with the collection of NRS Table 5 data, the charts below represent the employment outcomes and other follow-up indicators for participants who exited OSSE AFE funded programs during the prior program year (FY19). It is important to note that, like NRS Table 4, the state’s performance on NRS Table 5 in FY20 was also impacted by the COVID-19 pandemic. While the state experienced a 5.57 percent increase in the percentage of participants employed the second quarter after exit in FY20 (%=21.57 percent) compared to 16.00 percent in FY19, the state had a 1.57 percent decrease in the percentage of participants employed the fourth quarter after exit in FY20 (% = 19.63 percent) compared to 21.20 percent in FY19. As a result of the public emergency, many District residents are unemployed or are experiencing a loss in wages. This is reflected in the 8.00 percent decrease in median earnings of participants in FY20 (n=\$6,409) compared to \$7,021 in FY19. While the state experienced a 9.96 percent increase in the percentage of participants who attained any credential in FY20 (%=54.16 percent) compared to 44.20 percent in FY19, due to the lag in NRS Table 5 data the state may experience a decrease in its performance in FY21 due to the timeline in which new protocols for GED testing, workforce training, practicum experiences and work-based learning have been and/or are being developed in response to the shift from place-based to remote learning experiences needed for credential attainment due to the pandemic.

Core Follow-up Outcome Measures (A)	Number of Participants who exited (B)	Number of Participants Who Exited Achieving Outcome or Median Earnings Value (C)	Percent Achieving Outcome (D)	Total Periods of Participation (E)	Number of Periods of Participation Achieving Outcome or Median Earnings Value (F)	Percent of Periods of Participation Achieving Outcome (G)	FY 19 Performance Outcomes
Employed Second Quarter after Exit	890	194	21.79%	904	195	21.57%	16%
Employed Fourth Quarter after Exit	1,010	201	19.90%	1,029	202	19.63%	21.20%
Median Earnings Second Quarter after Exit	194	\$6,409.00	N/A	195	\$6,409.00	\$6,409.00	\$7,021

Core Follow-up Outcome Measures (A)	Number of Participants who exited (B)	Number of Participants Who Exited Achieving Outcome or Median Earnings Value (C)	Percent Achieving Outcome (D)	Total Periods of Participation (E)	Number of Periods of Participation Achieving Outcome or Median Earnings Value (F)	Percent of Periods of Participation Achieving Outcome (G)	FY 19 Performance Outcomes
Attained a Secondary School Diploma/Equivalent and Enrolled in Postsecondary Education or Training within one year of exit	68	19	27.94%	68	19	27.94%	N/A
Attained a Secondary School Diploma/Equivalent and Employed within one year of exit	68	10	14.70%	68	10	14.70%	N/A
Attained a Postsecondary Credential while enrolled or within one year of exit	572	312	54.54%	578	314	54.32%	N/A
Attained any credential (unduplicated)	594	323	54.37%	600	325	54.16%	44.2%

#### Attainment of a Secondary School Diploma/Recognized Equivalent

For the period of July 1, 2019 – June 30, 2020:

- 179 District residents passed all four components of the GED Exam and earned a DC State Diploma.
- 43 DC residents completed the National External Diploma Program and earned a DC Public School, DC Public Charter School or DC State Diploma.

### III. Integration with Other Programs

#### A. Describe how the state-eligible agency, as the entity responsible for meeting one-stop requirements under 34 CFR part 463, subpart J, carries out or delegates its required one-stop roles to eligible providers.

The OSSE AFE recognizes that relationships with WIOA partners are pivotal in delivering learner-centered integrated services to District residents. In FY20, the OSSE AFE continued its efforts to collaborate with the District's WIC, Grants and Associates, Inc. (the District's One-Stop Operator), DOES, DHS, DDS/RSA, UDC-CC and other partners to fulfill its one-stop responsibilities. This included working with partners to establish uniform intake, assessment and program referral practices, and working collaboratively to support learners' academic achievement and success while engaged in workforce readiness, job training and postsecondary education transition activities. OSSE AFE continued to work with several of the WIOA core partners/one-stop required partners and Literacy Pro Systems, Inc., to implement and build upon the DC Data Vault. See description of the DC Data Vault activities under Section I. State Leadership. Additionally, OSSE staff serve on the District's WIC and attend WIOA Workgroup Meetings, DC Data Vault Workgroup Meetings, Career Pathways Task Force Meetings and One-Stop Operator partner meetings to strategize ways to develop a more

cohesive and collaborative workforce development/career pathways system in the District of Columbia that aligns with the mandates of WIOA and the District's approved WIOA State Unified Plan.

**B. Describe the applicable career services that are provided in the one-stop system.**

OSSE AFE has been partnering with DOES since 1998 to support the integration of adult education, career development, and employment and training activities for District residents. The partnership was formalized through a memorandum of understanding from FY13 through FY16 and supported with funding from both DOES and OSSE AFE. While there was no MOU extension in FY17, FY18, FY19, or FY20, OSSE AFE continued to use its funding to support the provision of assessment, screening and program referral services to District residents coming through the one stop system. OSSE AFE American Job Center (AJC) provider partners provide one full day or two half days of services per week at each of the four DOES American Job Centers. Additionally, through the partnership, all OSSE AFE providers continued to serve District residents through the one-stop system.

**C. Describe how infrastructure costs are supported through state and local options.**

OSSE AFE entered into a Memorandum of Understanding (MOU) with the District's WIC and DOES in FY17 that is modified annually. The MOU specifies the responsibilities that OSSE will fulfill as a one-stop partner. Additionally, OSSE provides local funding via an MOU with the WIC to DOES each year to support the one stop infrastructure costs and activities. OSSE also contributes to the one-stop system through the provision of funding to three OSSE AFE local program providers to offer assessment, screening and program referral services weekly at the DOES AJCs. OSSE AFE also provides CASAS Implementation, CASAS eTest Coordinator and Proctor, CASAS Remote Testing, Supporting Adults with Special Needs and DC Data Vault training and CASAS web-test units to one-stop partners; and hosts and maintains the DC Data Vault, in collaboration with Literacy Pro Systems, Inc., for use by one-stop partners.

**IV. Integrated English Literacy and Civics (IELCE) Program**

Below is a description of how OSSE AFE is using funds under Section 243 to support IELCE program activities:

**A. Describe when your state held a competition [the latest competition] for IELCE program funds and the number of grants awarded by your State to support IELCE programs.**

OSSE AFE, in collaboration with the DC WIC, continued to fund and support eligible providers selected as sub-grantees as a result of the Adult Education and Family Literacy Act (AEFLA) and WIC Career Pathways grant competition in spring 2017. Three of 10 eligible providers were selected to provide Integrated English Literacy and Civics Education (IELCE) and Training to District residents. OSSE AFE, in collaboration with the WIC, conducted a new grant competition in FY20 for FY21-25 AEFLA funding, including Sec. 243 IELCE, and awarded IELCE funding to four of 12 providers.

**B. Describe your state efforts in meeting the requirement to provide IELCE services in combination with integrated education and training activities.**

OSSE AFE is funding eligible providers to develop and implement innovative program models that include the provision of Integrated English Literacy and Civics Education (IELCE) concurrently and contextually with workforce preparation activities and workforce training for a specific occupation or occupational cluster to English learners (ELs) for the purpose of educational and career advancement.



Program models include: 1) services to professionals with degrees and credentials in their native countries; 2) services that enable adult learners to achieve competency in the English language and acquire the basic and more advanced skills needed to function effectively as parents, workers, and citizens in the United States; and 3) the provision of career pathway mapping, workforce preparation and workforce training including career awareness, career exploration, and career planning services appropriate for English learners. Students participate in EL/civics activities that focus on civic engagement, American history and government, American culture and values, and paths to naturalization while also engaging in occupational skills training that prepare them to pursue their desired career path.

**C. Describe how the state is progressing toward program goals of preparing and placing IELCE program participants in unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency as described in section 243(c)(1) and discuss any performance results, challenges, and lessons learned from implementing those program goals.**

OSSE AFE continues to work with its three IELCE and Training sub-grantees, its WIOA core partner agencies and/or other key stakeholders to identify opportunities for students to participate in unsubsidized employment in the District's high demand industries. Each sub-grantee has employer partners that provide work-based learning, internships and/or externships to students that sometimes lead to unsubsidized employment. OSSE AFE expects that the provision of integrated English Literacy, Civics Education, workforce preparation and workforce training will enhance the likelihood that English learners will be afforded to opportunity to pursue occupations that lead to economic self-sufficiency.

**D. Describe how the State is progressing toward program goals of ensuring that IELCE program activities are integrated with the local workforce development system and its functions as described in section 243(c)(2) and discuss any performance results, challenges, and lessons learned from implementing those program goals.**

OSSE AFE works closely with the District's WIC to ensure that the adult education and literacy activities are aligned with the District's WIOA State Plan, career pathways initiative, and local workforce development system. Also see the response to B. and C. above.

**V. Adult Education Standards**

**A. If your State has adopted new challenging K-12 standards under Title I of the Elementary and Secondary Education Act of 1965, as amended, describe how your Adult Education content standards are aligned with those K-12 standards**

In FY20, OSSE AFE staff and local providers continued to increase their understanding of the Common Core State Standards (CCSS) and the College and Career Readiness Standards (CCRS) and their implication for adult education. In addition to CCSS/CCRS, OSSE AFE continued its efforts to work with its sub-grantees to integrate the Comprehensive Adult Student Assessment System (CASAS) competencies and basic skills content standards in their lessons/programs and to assist local program staff via professional development, technical assistance and resources to employ a standards-based approach to teaching adult learners in a more succinct and comprehensive way.

**B. Optional – Describe implementation efforts, challenges, and any lessons learned.**

OSSE AFE recognizes that it takes time to increase local programs' understanding and integration of standards in their programs. As such, the state continues to provide professional development, technical

assistance and resources to local program providers and to monitor and evaluate their efforts to integrate relevant standards into their program designs.

**VI. Programs for Correction Education and Education of Other Institutionalized Individuals (AEFLA Section 225)**

**A. What was the relative rate of recidivism for criminal offenders served? Please describe the methods and factors used in calculating the rate for this reporting period.**

OSSE AFE estimates that the relative rate of recidivism is 57.00 percent (n=38 of 67) for offenders served. The methods and factors used in calculating the rate for the reporting period include the following:

Methods:

- An analysis of students populating NRS Table 10 – Outcome Achievement for Adults in Correctional Education.
- An analysis of employment and/or wage data via student follow-up survey data in LACES, the state’s management information system.
- An analysis of student enrollment data and instructional hours in FY20 in LACES.

Factors:

- The total number of students served in FY20 was 67 per NRS Table 10 – Outcome Achievement for Adults in Correctional Education.
- Of the 67 students, 20 exited achieving an outcome or median earning value in FY20 (based on aligned survey and data matching results).
- Of the 67 students, 9 re-enrolled and had instructional hours in FY21.
- $20 + 9$  (re-enrolled students with instructional hours) = 29 students that did not recidivate.
- $29/67 = 43.00$  percent of students did not recidivate.
- $100$  percent minus  $43.00$  percent =  $57.00$  percent (n = 38) of students may have returned to a previous pattern of delinquent behavior or criminal conduct.

It is important to note that the recidivism rate could be less than 57 percent. Because we do not have wage, enrollment or instructional hours data for the 38 students, there is a possibility that some of them may not have recidivated and one or more of the following may be true:

- Some students may have enrolled in another program that is not funded by the state or a partner agency or may not have an interest in participating in a program at this time.
- Some students may be unemployed.
- Some of the students may be self-employed or day laborers, and thereby responsible for reporting their own wages/income independent of an employer.
- Some students may be working as contractors/sub-contractors. If their employers don’t pay unemployment insurance for these individuals or they don’t report their earnings, it is difficult to track whether they had earnings.
- Some students, who did not provide a Social Security Number, may be employed. However, the state was unable to data match with unemployment insurance for these students due to a lack of social security numbers.
- Some students are transient. They may have left the state or region to seek employment in another state or region for which the state cannot data match.