

OHIO DISCUSSION POINTS
WIA ANNUAL PERFORMANCE MEASURES, INCENTIVES, AND SANCTIONS

KEY CONSIDERATIONS

1. In addition to WIA performance measures, are there any other outcomes that should be established for workforce areas i.e. expenditure levels, percentage of job openings filled, etc.
2. What will be the benchmark levels to determine success/failure of performance outcomes? Who will establish these levels?
3. What data collection system will be used to capture performance data? Who will be responsible for input of information? Who will monitor data for accuracy/integrity?
4. Will mitigating circumstances be included in determination of performance outcomes, i.e. severe economic downturn, natural disaster, etc.
5. Ohio Option – What is this local area’s policy for handling incentives/sanctions within its sub-areas? Should this even be a consideration at the state-level or is this a local area decision?

INCENTIVES

1. What types of incentives will be provided to reward satisfactory performance?
2. If monetary incentives are provided, what funding source(s) will be utilized?
3. How will incentive level(s) be established, i.e. pro-rated across achievement of measures, must “meet/exceed” all, etc.
4. How will incentives be provided to those areas that meet expectations, i.e. equally among all eligible areas, pro-rated based on workforce area size, etc.
5. Who will be responsible for determining success/failure of performance requirements?
6. Who will be responsible for providing performance incentives to local areas?

SANCTIONS

1. What types of sanctions will be imposed on those areas not achieving performance requirements, i.e. monetary, technical assistance, etc.
2. Will there be different levels of sanctions, i.e. based on number of measures failed, severity of failure, continued failure, etc.
3. Who will be responsible for carrying out imposed sanctions?

INCENTIVES

ROLE OF SANCTIONS

1. Reward achievement of performance outcomes.
2. Encourage local areas to provide desired workforce programs/activities.
3. Support innovative service delivery methods.

EXAMPLE METHODS FOR DETERMINING INCENTIVES

1. Must meet ALL performance requirements to be eligible.
2. Must meet ALL performance requirements plus certain expenditure levels to be eligible.
3. Must meet a certain percentage of performance requirements to be eligible – may be grouped by category such as Adult, DLW, or Youth – or may be lumped together.
4. May break performance requirements into various categories – some mandatory, such as WIA Common Measures while others are optional.
5. Specific incentives are tied to achievement of specific performance outcomes – such as a set dollar amount for filling a certain percentage of job openings (or training a certain percentage of persons for a specific technology/occupation).

EXAMPLE METHODS FOR DISSEMINATING INCENTIVES

1. All eligible areas equally share incentives.
2. Incentives are given to eligible areas using a pro-rata basis based on size of workforce area as compared to the size of the pool of eligible candidates.
3. Incentives are provided based on achievement of specific outcomes (see #4 above).

*Note: If WIA funds are used to pay incentives, then local areas must use these new funds in accordance with WIA rules and regulations.

SANCTIONS

ROLE OF SANCTIONS

4. Ensure accountability at the local level.
5. Ensure acceptable return on investment of federal funds.
6. Ensure achievement of desired outcomes.
7. Support state in meeting workforce goals.

EXAMPLES OF SANCTIONABLE ACTS

1. Failure to meet required performance measures.
2. Failure to meet required expenditure levels.
3. Failure to submit timely and accurate performance reports.
4. Failure to submit timely and accurate financial reports.
5. Failure to take corrective action as required due to monitoring, investigation, and/or review.
6. Failure to resolve audit findings and/or questioned costs.
7. Failure to submit the annual audit required by OMB Circular A-133.
8. Breach of administrative and service provision requirements.
9. Failure to retain service provision records.
10. Failure to retain financial records.
11. Failure to rectify reported threats to health and safety.
12. Failure to

EXAMPLES OF SANCTIONS

1. Technical Assistance
 - a. Corrective Action Plan to improve deficiency(ies)
 - b. Staff Training
 - c. On-site visits by State (or State designee) to monitor improvement
 - d. Meetings and other technical assistance
2. Comprehensive Assistance
 - a. Prohibition of certain activities and/or service providers
 - b. State oversight and management of local activities
 - c. Reorganization of the local area
 - d. Restructuring of the local workforce board
 - e. Merging the local area into one or more other workforce areas
3. Monetary Sanctions
 - a. Repayment
 - b. Deobligation of local area funds
 - c. Ineligibility for incentive and/or discretionary funds