

JOSH GREEN, M.D.
GOVERNOR

SYLVIA LUKE
LIEUTENANT GOVERNOR



JADE T. BUTAY
DIRECTOR

WILLIAM G. KUNSTMAN
DEPUTY DIRECTOR

MARICAR PILOTIN-FREITAS
ADMINISTRATOR

STATE OF HAWAII
KA MOKU'ĀINA O HAWAII
DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS
KA 'OIHANA PONO LIMAHANA
WORKFORCE DEVELOPMENT DIVISION
830 PUNCHBOWL STREET, ROOM 329
HONOLULU, HAWAII 96813
<http://labor.hawaii.gov/wdd/>
Phone: (808) 586-8877 / Fax: (808) 586-8822
Email: dilir.workforce.develop@hawaii.gov

May 12, 2023

SN (61)

WIOA BULLETIN NO. 02-23

TO: WIOA Partners

FROM: Maricar Pilotin-Freitas, Administrator
Workforce Development Division

SUBJECT: Workforce Innovation and Opportunity Act (WIOA) Title I Adult, Dislocated Worker, and Youth Programs Local Workforce Development Board Performance Negotiations and Sanctions Policy

PURPOSE

This bulletin provides guidance on the procedure, methodology, and timeline for determining the performance levels for Local Workforce Development Boards (LWDBs). It also provides guidance on the failure and sanctions policy for failing to meet local area primary indicators of performance. This bulletin updates the Local Area Performance Failure and Sanctions policy WIOA Bulletin No. 02-22 and the PY 2020 and PY 2021 Local Workforce Development Board Performance Negotiations Guidance No. 35-20.

BACKGROUND

On June 2, 2022, the Workforce Development Division (WDD) received confirmation from Region 6 of the U.S. Department of Labor, Employment and Training Administration (ETA) on the negotiated performance levels for the WIOA Title I Adult, Dislocated Worker, and Youth Programs. The PY 2022 negotiated performance levels for Employment Rate 2nd Quarter After Exit, Employment Rate 4th Quarter After Exit, Median Earnings 2nd Quarter After Exit, Credential Attainment Rate, and Measurable Skills Gains are listed in Attachment 1.

Section 116 of the Workforce Innovation and Opportunity Act of 2014 establishes a performance accountability system to assess the effectiveness of the State and local areas in achieving outcomes for individuals served by WIOA core programs. WIOA Section 116(g) requires the State to take actions and impose sanctions when a LWDB fails to meet its local area primary indicators of performance. Guidance on determining performance failure and calculating performance scores is provided in U.S. Department of Labor's (USDOL's) ETA Training and Employment Guidance Letter (TEGL) No. 11-19. The State issued WIOA Bulletin Nos. 19-18 and 35-20 on local area performance negotiations for past program years and will issue subsequent WIOA bulletins for future program years. The State issued WIOA Bulletin No. 02-22 on its Local Area Performance and Sanctions Policy. That bulletin is updated in this bulletin by combining the PY 2022 and PY 2023 Local Workforce Development Board Performance Negotiations with the Failure and Sanctions Policy.

DEFINITIONS

Negotiated Level of Performance is a target goal that is mutually agreed upon before the start of a program year, first by the State and the USDOL, ETA for a Statewide performance indicator and then by the State and a LWDB for a local area performance indicator. The negotiated levels are written in the unified State plan.

Adjusted Level of Performance is an adjustment to a negotiated level of performance that is calculated after the end of a program year. The adjusted level factors in actual participant characteristics and current economic conditions for the program year that is being assessed.

Actual Level of Performance is the reported outcome for a performance indicator reported after the end of a program year in an ETA-9169 annual report.

Individual Indicator Score represents how well a performance indicator has performed based on the adjusted level of performance. It is calculated by dividing the actual level of performance by the adjusted level of performance.

Overall Local Area Program Score is the average of individual indicator scores for a single WIOA program for a particular local area. This score indicates how well an entire program has performed in view of all the performance indicators associated with that program for a local area.

Overall Local Area Indicator Score is the average of the indicator scores for the same performance indicator across the WIOA Adult, Dislocated Worker, and Youth programs (three WIOA Title I programs) for a particular local area. This score indicates how well a particular performance indicator has performed across three WIOA Title I programs for a local area.

POLICY

After the end of a program year, the State will reassess local area performance, using a Statistical Adjustment Model, and make adjustments to the negotiated levels of performance based on the actual levels of performance and current economic conditions. The resulting performance scores made from the adjustments will be issued in a WIOA Bulletin, which will be issued following the end of the program year. Based on these published scores, the State will determine which performance scores have fallen below the failure threshold. Any LWDB that has one or more performance scores falling below the failure threshold will be notified in writing to inform the LWDB about the failure(s) and what action(s) must be taken in order to make improvements to ensure success in the next following program year. A formal notification by the State must be made by end of the second quarter following the end of the program year. Technical assistance will commence in January following a formal notification and could end after 12 months or earlier, depending on whether further assistance is needed.

PROCEDURES

To facilitate performance negotiations for the LWDBs, WDD established the final target performance levels for respective local areas, guided by the State-level targets and TEG L No. 11-19 issued February 6, 2020. Each LWDB's final agreements are consistent with the performance levels established for the State of Hawaii, using past performance in individual indicators of performance, and industry outlook, including participant characteristics which may include gender, age, race, and barriers to employment such as long-term unemployment, low-income status, TANF eligibility, low level of English proficiency, disability, ex-offender status, and homelessness, using a Statistical Adjustment Model to adjust for current economic conditions.

To assist the process, actual results for the last two program years were used (Attachments 2 and 3). These attachments show actual performance levels achieved in PY 2020 and PY 2021, respectively. The PY 2021 data included preliminary results from the last four rolling quarters of the program year and may not have included all final wage data. Final PY 2021 actual performance levels for the entire year will be released in the PY 2021 Annual Report.

The LWDBs will submit a Letter of Agreement signed by the Chairperson and Mayor of each LWDB agreeing to a narrative that explains the factors taken into consideration for determining performance level for the local areas due to WDD by the end of the second quarter.

The Negotiation Process

The following table provides a timeline for the negotiations process, which occurs every two years.

Action	Timeline
USDOL and the State negotiate to reach State level negotiated goals.	By June 30th
The State will release a bulletin with the State’s negotiated goals and inform Local Areas that the negotiation process has begun.	By mid-July
The State will schedule negotiations and provide the pre-negotiated target number to each Local Area.	By mid-July
Local Areas can access the previous PY’s preliminary annual report after the fourth quarter report has been certified with USDOL.	By last Friday in August
The State and LWDBs will negotiate to reach Local Area level negotiated goals.	By September 30
The State adjusts the Local Area level negotiated goals.	By March 31, in the next calendar year following the end of the PY

CALCULATION OF PERFORMANCE LEVELS AND SCORES

As required by section 116(b)(3)(A)(viii) of WIOA, the State estimates levels of performance based on participant characteristics and economic conditions using a statistical adjustment model. The *First Estimated Level of Performance* is provided to the LWDB prior to the start of the program year during the negotiations process and is a factor in reaching agreement on the *Negotiated Level of Performance*.

The *Second Estimated Level of Performance* is calculated after the end of the program year. The State will re-estimate the LWDB’s performance using the same statistical adjustment model coefficients updated with the characteristics of the actual participants served and the actual economic conditions of the local area.

Table 1 provides an example of calculating the adjusted level of performance. The State will subtract the *First Estimated Level of Performance* from the *Second Estimated Level of Performance* to get the *Adjustment Factor*. Note that the *Adjustment Factor* can be a positive or negative value. The positive or negative *Adjustment Factor* is added to the *Negotiated Level of Performance* to arrive at the *Adjusted Level of Performance*.

The State must calculate adjusted levels of performance and performance scores for all primary indicators of performance for all WIOA Title I programs after the end of the program year but no later than the start of negotiations with the LWDB.

Table 1. Example of Calculation of Adjusted Level of Performance

Negotiated Level of Performance	70.2%
First Estimated Level of Performance	75.5%
Second Estimated Level of Performance	73.7%
Adjustment Factor	73.7% – 75.5% = -1.8%
Adjusted Level of Performance	-1.8% + 70.2% = 68.4%

The *Individual Indicator Score* is calculated by dividing the *Actual Level of Performance* achieved by the *Adjusted Level of Performance*. The *Individual Indicator Score* will not be rounded; it will be truncated to the first decimal place.

Table 2 illustrates the determination of performance success or failure across all indicators of performance for a single program. The performance scores are calculated for each primary indicator of performance and the average is computed. In this example, the *Individual Indicator Score* for Employment 4th Quarter After Exit is a performance failure because it is below the 50 percent threshold. The *Overall Local Area Program Score* is 85.3 percent, so the program as a whole is a performance failure because it is below the 90 percent threshold. Scores highlighted in red indicate performance failures.

Table 2. Example of Calculation of Overall Local Area Program Score

Primary Indicator of Performance	Actual Level of Performance (Numerator/Denominator)	Adjusted Level of Performance	Individual Indicator Score Calculation
Employment 2 nd Quarter After Exit	$\frac{75}{100}$	80.1%	$\left(\frac{75}{100}\right) \div 80.1\% = 93.6\%$
Employment 4 th Quarter After Exit	$\frac{40}{110}$	75.4%	$\left(\frac{40}{110}\right) \div 75.4\% = 48.2\%$
Median Earnings 2 nd Quarter After Exit	\$5,500	\$6,000	$\$5,500 \div \$6,000 = 91.6\%$
Credential Attainment	$\frac{60}{90}$	72.8%	$\left(\frac{60}{90}\right) \div 72.8\% = 91.5\%$
Measurable Skill Gains	$\frac{80}{95}$	82.5%	$\left(\frac{80}{95}\right) \div 82.5\% = 102.0\%$
Overall Local Area Program Score (Average of Individual Indicator Scores for One Program)	—	—	85.3%

Table 3 illustrates the calculation for a single primary indicator of performance across all WIOA Title I programs. In this example, the performance scores are calculated for the Employment 2nd Quarter After Exit indicator for each program, and the average is computed. The *Overall Local Area Indicator Score* is 91.7 percent, so the Employment 2nd Quarter indicator achieved performance success across the Adult, Dislocated Worker, and Youth programs overall.

Table 3. Example of Calculation of Overall Local Area Indicator Score

Program	Actual Level of Performance (Numerator/Denominator)	Adjusted Level of Performance	Individual Indicator Score Calculation
Adult	$\frac{80}{125}$	90.5%	$\left(\frac{80}{125}\right) \div 90.5\% = 70.7\%$
Dislocated Worker	$\frac{90}{100}$	80.2%	$\left(\frac{90}{100}\right) \div 80.2\% = 112.2\%$
Youth	$\frac{90}{150}$	65.0%	$\left(\frac{90}{150}\right) \div 65.0\% = 92.3\%$
Overall Local Area Indicator Score (Average of the Same Individual Indicator Scores Across Programs)	—	—	91.7%

Threshold For Failure

In accordance with 20 CFR § 677.190(d) and 34 CFR §§ 361.190(d) and 463.190(d), a performance failure occurs if:

- Any single *Individual Indicator Score* for any single program falls below 50 percent of the adjusted level of performance;
- The *Overall Local Area Program Score* falls below 90 percent for that single program; or
- The *Overall Local Area Indicator Score* falls below 90 percent for that single measure.

The methods of calculating the Individual Indicator Score, the Overall Local Area Program Score, and the Overall Local Area Indicator Score are described below.

The State must keep an accurate record of tracking all performance indicators that have exceeded failure thresholds for all WIOA core programs for at least three consecutive program years.

A sanction on a performance failure will be imposed when the same performance indicator of a WIOA core program fails in three consecutive program years. No sanctions will be imposed on the first and second consecutive program years. The State will provide technical assistance after the first performance failure and additional more intense technical assistance after the second performance failure. A performance improvement plan will be implemented after the second year. If after all efforts to provide assistance fail to help performance improve in the third consecutive program year, then the State will impose a sanction on the LWDB. This shall allow for sufficient time to make necessary improvements.

The beginning program year in which the State will determine performance failures is Program Year 2022. Published performance scores for Program Years 2020 and 2021 are for information purposes used to establish a baseline of performance. Any performance failures in Program Years 2020 and 2021 will not be counted toward determining whether a sanction will be imposed. The first possible program year for which a sanction may be imposed will be Program Year 2024.

The LWDB should use all published performance scores for any program year as a part of program planning and implementation.

I. Failure for the First Program Year

A. In accordance with WIOA Section 116(g)(1), the State shall provide technical assistance, which may include assistance in the modifying the current local plan, if an LWDB fails to meet an overall program score, and overall indicator score, or any one of the following local area primary indicators of performance according to the failure thresholds stated above for any program year:

1. For the WIOA Title I Adult or Dislocated Worker Program:

- i. The percentage of program participants who are in unsubsidized employment during the second quarter after exit from the program;
- ii. The percentage of program participants who are in unsubsidized employment during the fourth quarter after exit from the program;
- iii. The median earnings of program participants who are in unsubsidized employment during the second quarter after exit from the program;
- iv. The percentage of program participants who obtain a recognized postsecondary credential, or a secondary school diploma or its recognized equivalent (subject to WIOA Section 116(b)(2)(iii)), during participation in or within one year after exit from the program; or
- v. The percentage of program participants who, during a program year, are in an education or training program that leads to a recognized postsecondary credential or employment and who are achieving measurable skill gains toward such a credential or employment.

2. For the WIOA Title I Youth Program:
 - i. The percentage of program participants who are in education or training activities, or in unsubsidized employment, during the second quarter after exit from the program;
 - ii. The percentage of program participants who are in education or training activities, or in unsubsidized employment, during the fourth quarter after exit from the program;
 - iii. The median earnings of program participants who are in unsubsidized employment during the second quarter after exit from the program;
 - iv. The percentage of program participants who obtain a recognized postsecondary credential, or a secondary school diploma or its recognized equivalent (subject to WIOA Section 116(b)(2)(iii)), during participation in or within one year after exit from the program; or
 - v. The percentage of program participants who, during a program year, are in an education or training program that leads to a recognized postsecondary credential or employment and who are achieving measurable skill gains toward such a credential or employment.

II. Failure for Two Consecutive Program Years

If an LWDB continues to fail to meet the same overall program score, the same overall indicator score, or the same aforementioned local area primary indicators of performance according to the failure thresholds stated above for a consecutive program year, the State shall continue to provide technical assistance, which must include assistance in the development of a performance improvement plan.

III. Failure for Three Consecutive Program Years

In accordance with WIOA Section 116(g)(2)(A), if an LWDB continues to fail to meet the same overall program score, the same overall indicator score, or the same aforementioned local area primary indicators of performance according to the failure thresholds stated above for a third consecutive program year, the State shall impose development of a reorganization plan and shall impose one of the following sanctions:

- A. Require the appointment and certification of a new LWDB, consistent with the criteria established under WIOA Section 107(b) (WIOA Section 116(g)(2)(A)(i));
- B. Prohibit the use of the same service provider(s) and one-stop partner(s) identified as achieving a poor level of performance (WIOA Section 116(g)(2)(A)(ii)); or
- C. Take such other significant actions as the State determines are appropriate (WIOA Section 116(g)(2)(A)(iii)). One such action may be a reduction of five percent in the next following program year's local area allocation.

The Federal Project Officer will be notified when the State has taken an action pursuant to paragraph A of this section.

TECHNICAL ASSISTANCE

Technical assistance will be described in detail, which includes specific activities that will be carried out and a schedule of activities, upon notification of providing technical assistance. Technical assistance may take as long as one year following the program year for which a performance failure has been determined. The State may assist the LWDB in modifying its local plan, which may include revising strategies and tactics to implement the program and/or to improve outreach and engagement with program participants. If upon the second program year, the same performance indicator fails, the State will reassess the technical assistance activities and develop assistance that will be more intense that involves engagement with LWDB staff and other personnel on a more frequent basis, which may take as long as one year. This deeper level of effort may include working directly with the service provider. This deeper level of effort may include development of a performance improvement plan.

APPEAL PROCESS

An LWDB may appeal a sanction by submitting an appeal letter via postal mail to the Director of the Department of Labor and Industrial Relations within 30 calendar days after the date of a notification of a sanction cannot be applied. The letter must state that the LWDB objects to the specified sanction and provide reasons why the sanction must be revoked. The letter must include attachments of the sanction notification, records of performance scores, documentation of technical assistance and the outcome of assistance, and any other relevant information that may be pertinent in the LWDB's case. The Director will review the appeal letter and sanction notification and may convene a meeting to hear the facts of the matter. A ruling on the appeal will be made in writing by the Director within 60 calendar days after receiving the appeal letter. The Director's ruling on the appeal is final.

EFFECTIVE DATE

This bulletin is effective immediately.

INQUIRIES

Inquiries regarding this bulletin may be directed to Ms. Lisa Simmons at (808) 586-8812 or Lisa.E.Simmons@hawaii.gov

REFERENCES

- Workforce Innovation and Opportunity Act of 2014, Public Law 113-128
- Code of Federal Regulations: 20 CFR § 677.190(d) and 34 CFR §§ 361.190(d) and 463.190(d)
- TEGL No. 11-19, *Negotiations and Sanctions Guidance for the Workforce Innovation and Opportunity Act (WIOA) Core Programs*, February 6, 2020

- WIOA Bulletin No. 19-18, PY 2018 and PY 2019 Local Workforce Development Board Performance Negotiations for Workforce Innovation and Opportunity Act (WIA) Title I Adult, Dislocated Worker, and Youth Programs, May 25, 2018
- WIOA Bulletin No. 35-20, PY 2020 and PY 2021 Local Workforce Development Board Performance Negotiations for Workforce Innovation and Opportunity Act (WIOA) Title I Adult, Dislocated Worker, and Youth Programs, July 13, 2020

ATTACHMENTS

Attachment 1: PY 2022 and PY 2023 State-level Negotiated Performance Levels

Attachment 2: PY 2020 Actual Performance Levels for the State and Local Areas

Attachment 3: PY 2021, Rolling Four Quarters Actual Performance Levels for State and Local Areas

Attachment 4: Hawaii Program Year 2022 Statewide and Local Area Performance Measures (July 1, 2022 to June 30, 2023)

Attachment 1
PY 2022 and PY 2023 State-level Negotiated Performance Levels

Performance Indicator	PY 2022	PY 2023
Adult Program		
Employment Rate (Q2)	60%	60%
Employment Rate (Q4)	65%	65%
Median Earnings	\$6,800	\$6,800
Credential Rate	58%	58%
Measurable Skill Gains	55%	55%
Dislocated Work Program		
Employment Rate (Q2)	71%	71%
Employment Rate (Q4)	76%	76%
Median Earnings	\$8,500	\$8,500
Credential Rate	68%	68%
Measurable Skill Gains	57%	57%
Youth Program		
Employment Rate (Q2)	68%	68%
Employment Rate (Q4)	62%	62%
Median Earnings	\$4,300	\$4,300
Credential Rate	65%	65%
Measurable Skill Gains	53%	53%

Source: U.S. Department of Labor, Employment and Training Administration, June 2, 2022

ATTACHMENT 2
PY 2020 Actual Performance Levels for State and Local Area

Performance Indicator	State	Hawaii	Kauai	Maui	Oahu
Adult Program					
Employment Rate 2 nd Quarter After Exit	57.6%	49.3%	46.2%	50%	80%
Employment Rate 4 th Quarter After Exit	66%	54.8%	61.1%	44.4%	83.3%
Median Earnings 2 nd Quarter After Exit	\$6,574	\$5,977	\$5,263	\$2,323	\$7,415
Credential Rate Attainment	50%	25%	9.1%	0.0%	79.3%
Measurable Skill Gains	53.6%	59.5%	0%	28.6%	58.1
Dislocated Work Program					
Employment Rate 2 nd Quarter After Exit	71.1%	83.3%	58.3%	63.2%	74.1%
Employment Rate 4 th Quarter After Exit	76.1%	83.3%	64.3%	81.3%	75.9%
Median Earnings 2 nd Quarter After Exit	\$8,171	\$6,365	\$6,438	\$8,171	\$9,514
Credential Rate Attainment	48.7%	66.7%	0%	0%	68.2%
Measurable Skill Gains	53.9%	62.5%	0%	62.5%	60.4%
Youth Program					
Employment Rate 2 nd Quarter After Exit	61.0%	73.3%	*	58.5%	59.1%
Employment Rate 4 th Quarter After Exit	59.4%	68.2%	*	60.8%	57.6%
Median Earnings 2 nd Quarter After Exit	\$4,135	\$3,163	*	\$6,262	\$3,958
Credential Rate Attainment	41.2%	52.6%	*	14.3%	40.9%
Measurable Skill Gains	30.8%	17%	*	14%	41.8%

Source: Workforce Development Division Annual Report PY 2020

Note: There were no Youth Services in Kauai during this period.

ATTACHMENT 3

PY 2021, ROLLING FOUR QUARTERS ACTUAL PERFORMANCE LEVELS FOR STATE AND LOCAL AREAS

Performance Indicator	State	Hawaii	Kauai	Maui	Oahu
Adult Program					
Employment Rate 2 nd Quarter After Exit	53.3%	40.7%	77.8%	50%	73.9%
Employment Rate 4 th Quarter After Exit	53.0%	45.1%	66.7%	0%	73%
Median Earnings 2 nd Quarter After Exit	\$6,822.07	\$5,675.54	\$8,669.36	\$5488.90	\$9,100
Credential Rate Attainment	44.6%	29.6%	0%	0%	77.3%
Measurable Skill Gains	48.1%	57.9%	0%	40%	40.6%
Dislocated Worker Program					
Employment Rate 2 nd Quarter After Exit	54.3%	23.1%	72.2%	40.0%	70.0%
Employment Rate 4 th Quarter After Exit	50.0%	20.0%	54.5%	35.3%	75.0%
Median Earnings 2 nd Quarter After Exit	\$8,638.03	\$5,980.00	\$10,800	\$9,094.33	\$8,219.26
Credential Rate Attainment	61.3%	50.0%	0%	100.0%	81.3%
Measurable Skill Gains	59.1%	0.0%	0%	33.3%	66.7%
Youth Program					
Employment Rate 2 nd Quarter After Exit	55.3%	73.9%	*	30%	58.8%
Employment Rate 4 th Quarter After Exit	55.3%	69.2%	*	16.7%	63.3%
Median Earnings 2 nd Quarter After Exit	\$4,280.25	\$5,831.23	*	\$792.18	\$4,869.58
Credential Rate Attainment	69.0%	61.1%	*	0%	68.9%
Measurable Skill Gains	34.2%	28%	*	14.6%	59.3%

Source: HireNet Hawaii, ETA 9173 – WIOA Statewide and Local Performance Report, August 8, 2022.

ATTACHMENT 4

**Hawaii Program Year 2022 Statewide and Local Area Performance Measures
(July 1, 2022 to June 30, 2023)**

WIOA Adult Program

Performance Measure	Statewide Negotiated Level	Hawaii Negotiated Level	Kauai Negotiated Level	Maui Negotiated Level	Oahu Negotiated Level
Employment Rate 2 nd Quarter After Exit	60.0%	60.0%	60.0%	55.0%	65.0%
Employment Rate 4 th Quarter After Exit	65.0%	65.0%	65.0%	65.0%	76.7%
Median Earnings 2 nd Quarter After Exit	\$6,800	\$6,025	\$6,800	\$6,800	\$7,800
Credential Attainment	58.0%	58.0%	58.0%	58.0%	67.1%
Measurable Skill Gains	55.0%	60.0%	55.0%	55.0%	66.0%

WIOA Dislocated Worker Program

Performance Measure	Statewide Negotiated Level	Hawaii Negotiated Level	Kauai Negotiated Level	Maui Negotiated Level	Oahu Negotiated Level
Employment Rate 2 nd Quarter After Exit	71.0%	65.3%	78.0%	65.0%	75.5%
Employment Rate 4 th Quarter After Exit	76.0%	76.0%	76.0%	70.0%	83.0%
Median Earnings 2 nd Quarter After Exit	\$8,500	\$5,901	\$8,500	\$8,500	\$8,705
Credential Attainment	68.0%	70.3%	68.0%	75.0%	83.0%
Measurable Skill Gains	57.0%	63.0%	57.0%	57.0%	70.0%

WIOA Youth Program

Performance Measure	Statewide Negotiated Level	Hawaii Negotiated Level	Kauai Negotiated Level	Maui Negotiated Level	Oahu Negotiated Level
Employment Rate 2 nd Quarter After Exit	68.0%	77.6%	68.0%	64.0%	68.0%
Employment Rate 4 th Quarter After Exit	62.0%	66.5%	62.0%	55.0%	66.0%
Median Earnings 2 nd Quarter After Exit	\$4,300	\$4,600	\$4,300	\$3,900	\$4,300
Credential Attainment	65.0%	65.0%	65.0%	52.0%	73.0%
Measurable Skill Gains	53.0%	53.0%	53.0%	51.0%	57.0%