DRAFT DISCUSSION GUIDE:

SITE VISIT INTERVIEWS WITH AMERICAN JOB CENTER
AND LOCAL WORKFORCE DEVELOPMENT BOARD
ADMINISTRATORS/STAFF INVOLVED IN RESEA SERVICE DELIVERY -CHARACTERISTICS AND STATUS OF REEMPLOYMENT SERVICES AND
ELIGIBILITY ASSESSMENT (RESEA) PROGRAMS AT THE LOCAL LEVEL

Introduction

The environment in which RESEA programs has changed greatly in recent years and months. With the FY 2019 RESEA operating guidance (UIPL 07-19), In the last year, legislative and administrative action has significantly changed the RESEA program. the U.S. Department of Labor (DOL) afforded states greater flexibility in targeting RESEA service delivery to claimant populations. That flexibility was continued under the FY 2020 guidance (UIPL 08-20), along with new discretion on excluding certain populations from participation, requirements to prepare annual state plans, and other provisions. The Bipartisan Budget Act of 2018 (Public Law 115-123), which amended the Social Security Act, authorized substantially increased funding for RESEA programs, providing states with new opportunities to rethink the types and levels of services provided to claimants through the RESEA program. The statute also introduced a requirement that the funding be used for evidence-based interventions and requires evaluation of interventions that are not evidence based. DOL released guidance on implementation of those evidence-based requirements in UIPL 01-20.More recently, economic and public health changes resulting from COVID-19 have also dramatically impacted RESEA programs, the claimants they serve, and the employers who might hire them.

DOL's Chief Evaluation Office, in close collaboration with the Office of Unemployment Insurance, has contracted with Abt Associates and its partners the Urban Institute, Capital Research Corporation, and NASWA, to help implement the COVID-19., including how they are responding to more recent challenges brought on by statutory requirements. In order to understand how well existing evidence supports current interventions used by states, this project is conducting an implementation study to give DOL a detailed, systematic understanding of the components of states' current RESEA programsnew As part of an implementation study component of this study, the Abt team is conducting interviews with state workforce agencies, with a particular focus on better understanding current RESEA program components and plans for future RESEA program modification and development.

Privacy Statement: Before beginning the interview, I (we) want to thank you for agreeing to participate in this study and remind you that your participation is voluntary. I (we) know that you are busy and will try to be as brief as possible. We have many questions and are going to talk to many different people, so please do not feel as though we expect you to be able to answer every question. This interview is not part of an audit or a compliance review. We are interested in learning about your ideas, experiences, and opinions about RESEA and workforce services provided under this program to assist unemployment insurance claimants in your state. There

are no right or wrong answers. We want to know what you think. In addition, before we start, we want to let you know that although we will take notes during these interviews, we will, wherever possible, maintain privacy in any written reports that might include the information we learn and in discussions with DOL. To make sure that our notes are complete and accurate, we wanted to ask your permission to record this interview. We will erase this interview recording as soon as we have cleaned up our notes. Do we have your permission to record this interview?

Do you have any questions before we begin?

Do I have your permission to begin the interview?

I. Background on the Respondent(s)

Collect the following information on each respondent involved in the interview:

- Respondent's name
- Respondent's agency, division/unit
- Respondent's contact information (address, telephone, e-mail)
- Respondent's title and how long the respondent has been in his/her position
- Specific role of respondent in UI/RESEA program and number of years the respondent has been involved with UI and RESEA (and before that, REA)?
- Other roles (other than related to UI/RESEA), if appropriate.

II. Background on the American Job Center (AJC) and Local Workforce Agency

A. American Job Center

- 1. Who/what type of organization operates the AJC (e.g., public, nonprofit)?
- 2 How long has this organization been the operator of the AJC?
- 3 What geographic area does the AJC serve?
- 4 How many and what type of staff does the AJC have? [Ask for org chart.]
 - a. Total number of staff
 - b. Breakdown of staff by funding stream/program (e.g., Wagner-Peyser, WIOA)
- 5. What are the key partners/organizations located at the AJC. Please discuss.
- 6 How many customers does the AJC serve each month? Each year?
 - a. If available, what proportion of customers served are UI claimants?

B. Local Workforce Development Board (LWDB)

- 1. What type of organization is the LWDB (e.g., public, nonprofit)?
- 2. What is the organizational entity that staffs the LWDB?
- 3. How many staff does the LWDB have and what are the key positions?
- 4. Can you provide a brief overview of the LWDB's organizational structure and key responsibilities?
- 5. What geographic areas does this LWDB serve?
- 6. What are key local economic conditions of the area served by the LWDB?
 - a. Unemployment rate
 - b. Recent changes in number/type of UI claimants
- 7. How many AJCs serve this area:

a.	# of comprehensive full-service centers:	
b.	# of satellite centers:	

8.	Does the LWDB have any involvement in the RESEA program?	If yes,	please
	discuss the LWDB's involvement.		

III. Description of the Current RESEA Program

[Note to Interviewer: Pre-fill the section below based on information in the state plan and any other available documentation, such as what is available about UI/RESEA from the state's or AJC's website and the recent NASWA RESEA survey; where possible, confirm with respondent what is already known as a basis for the discussion.]

A. Current Operational Status of the Program and Response to COVID-19

- 1. Did your local workforce area suspend the requirement that UI claimants participate in RESEA (including the requirement to attend initial/subsequent RESEA sessions) in response to the COVID-19 pandemic? If no, skip to Question A2. If yes:
 - a. When was the RESEA program suspended (for your local area)?
 - b. Why was the RESEA program suspended?
 - c. Has the suspension been lifted?
 - If yes, when was this suspension of the RESEA program lifted?
 - If no, when do you anticipate that the RESEA suspension will be lifted? [Note to Interviewer: Skip to A3.]
- 2. If you did not suspend the requirement that UI claimants participate in RESEA, did your local RESEA program continue to operate as it had prior to the onset of the COVID-19 pandemic or did you make short-term changes to the RESEA program to respond to the COVID-19 pandemic? Please discuss. [Note to Interviewer, additional questions about longer-term effects of COVID-19 are included below, so this questions pertains to adjustments that may have been made by the state in the period in which the state was coping with effects of the pandemic.]
- 3. How would you characterize the current operational state of your RESEA program compared with prior to the COVID-19 pandemic i.e., RESEA program is still suspended, partially operational (but not yet back to pre-COVID operations), fully operational (back to pre-COVID operations in scale, even if there have been some adjustments made as a result of COVID). Please discuss.
 - a. If the program is suspended or still only partially operational, when do you expect the program to be back to a full and steady state of operation?
- 4. How has COVID-19 changed which industries are hiring and the occupations that they are hiring for?
 - a. How have labor demand shifts changed the types of workers that employers are searching for?
 - b. In what ways have those labor market changed your approach to helping individuals find work?

**Note for Interviewer and Respondent: For the remainder of this interview, if the local RESEA program is currently suspended or only partially operational, please respond to questions as you anticipate the RESEA program to operate once it returns to a full and steady state of operation.

B. RESEA Participation Levels and Scheduling

- 1. On average, about how many claimants are scheduled for a RESEA initial session at your AJC each week?
- 2. Overall, how much variation is there week-to-week in the number of claimants scheduled for RESEA initial sessions at your AJC? What accounts for this variation?
- 3. For the last completed fiscal year, how many total claimants were scheduled for an initial RESEA session at your AJC? [If not known, ask who might have this information.]

- a. Over the past three years, has there been variation in the number of claimants scheduled for initial sessions? If available, please provide number of claimants scheduled in the AJC for the last 3 years?
- b. If there has been variation in numbers scheduled, what factors have accounted for this change?
- c. Do you anticipate that the number of claimants scheduled for RESEA sessions in the current fiscal year will be greater, lesser, or at about the same level as the most recently completed fiscal year? If there is a projected change, why?
- d. Has the COVID-19 pandemic had any effect on the number of claimant scheduled? If so, please discuss for which year(s) and the effect of COVID-19 pandemic. Is this change in the number expected to have a temporary or more lasting effect on the program?
- 4. Has there been any change in the characteristics of claimants served in the RESEA program over the past 3 years?
 - a. If yes, what characteristics have changed?
 - b. If yes, what do you think may account for this change?
 - c. Did the COVID-19 pandemic have an effect on the characteristics of claimants served? If so how?
 - i. For instance, how do they differ in their educational attainment, skills, occupation, prior work experience, and tenure in their prior jobs?
 - ii. How confident are job seekers about being able to find work?
 - iii. Is this change expected to have a temporary or more lasting effect on the program?
 - d. Has there been any change in ex-servicemembers served by the RESEA program over the past three years? If yes, why?
 - e. Do you anticipate that characteristics of claimants scheduled for RESEA sessions will change in the coming year? If yes, how?
- 5. How is it determined how many claimants are selected and scheduled for initial RESEA sessions each week at your AJC (e.g., number of new claimants in the locality; number of staff available to conduct sessions)? Who makes this determination (e.g., state agency vs. AJC)?
- 6. How are you (the AJC) notified of the specific claimants that are scheduled to attend RESEA sessions at your AJC each week?
 - a. Please briefly describe the process by which the AJC is notified of the claimants scheduled for initial RESEA sessions.

C. RESEA Funding

[The UIPL 07-19 Guidance: For FY 2019, RESEA award limits are based on a 25 percent increase to each state's FY 2018 award limit.].

- 1. Has there been any change in your AJC's available funding for conducting RESEA sessions since FY 2018? If yes, could you provide your AJC's RESEA funding level for the past 3 years? If there has been an increase in funding for RESEA for the AJC:
 - a. In what specific ways has the increase in funding been used (or will be used) (e.g., added staff, purchase of new equipment, increasing numbers of claimants attending RESEA sessions, changing targeting strategies. changes to RESEA services, changed number of referrals to additional reemployment

- services, etc.)?
- b. How has the added funding impacted the numbers of UI claimants scheduled for RESEAs?
- c. Overall, how has the added funding enhanced your RESEA program?

D. Initial RESEA Session

[The UIPL 07-19 Guidance (and UIPL 08-18): The following core components must be included in the initial RESEA session:

- Assessing UI eligibility assessment, including review of work search activities, and referral to adjudication, as appropriate, if an issue or potential issue(s) is identified;
- Providing support to the claimant to develop and implement an individual reemployment plan;
- Providing labor market and career information that addresses the claimant's specific needs;
- Enrollment in Wagner -Peyser Act-funded Employment Services; and
- Providing information and access to American Job Center (AJC) services and referrals to reemployment services and training, as appropriate, to support the claimant's return to work.

Please note that the UI eligibility assessment and support with the development of an individual reemployment plan must continue to be provided on a one-on-one basis for the initial RESEA. However, states may provide staff-assisted services remotely using technology such as Skype, Zoom, FaceTime or other similar products. The level and timeliness of remote service must be comparable to assistance the individual would receive if staff were assisting such individual in-person.]

- 1. Once selected, how are UI claimants first notified that they are required to participate in their initial RESEA session at your AJC (e.g., online notification through UI system, email, telephone, US mail, etc.)?
 - a. Please provide an overview of the notification process. Please particularly highlight any AJC staff involvement in this process.
 - b. During what payment week (e.g., the week of the claimant's first payment) are RESEA participants typically notified of their selection for RESEA services? Does this vary? If yes, please explain.
 - c. How are these appointments scheduled (e.g., automatically scheduled, self-scheduled)?
 - d. Are any changes to the notification or scheduling process for the initial RESEA session planned (e.g., in the next three years)?
- 2. During which payment week (e.g., the claimant's 3rd payment week) are RESEA participants typically scheduled to attend their initial RESEA session at your AJC?
 - a. Is there a time limit for scheduling/re-scheduling of this initial session (i.e., before the 5th payment week)?
- 3. Please provide a brief description of the format and content of the initial RESEA session.

[Note to Interviewer: Check to see if the AJC has a PowerPoint

presentation that it uses during the initial RESEA session or any handouts that RESEA participants receive during the session – if yes, request copies. Also, check to see if there is a narrative description, handbook, and/or flow chart describing the initial RESEA session.]

- a. What are the main activities related to enforcement and review of claimant's UI eligibility? Please discuss.
- b. What are the main activities related to reemployment services (or career services) provided claimants during their initial RESEA session? Please discuss.
- c. What programming activities helps people get back to work (e.g., workshop to use LinkedIn, workshop on interviewing skills, soft skills training, basic IT training workshops, other skills training, wraparound services, functionality of state job-search websites, etc.)?

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4.	On average, ho	w many hours/minutes does it take for a RESEA participant to
	complete an in	itial RESEA session?hoursminutes
	a. How mu	ich time do each of the following activities typically take:
	i.	UI eligibility assessment, including review of work search
		activities, and referral to adjudication, as appropriate, if an
		issue or potential issue(s) is identified:minutes
	ii.	Providing support to the claimant to develop and implement an
		individual reemployment plan:minutes
	iii.	Providing labor market and career information that addresses
		the claimant's specific needs:minutes
	iv.	Enrollment in Wagner -Peyser Act-funded Employment Services:
		minutes
	v.	Providing information and access to American Job Center (AJC)
		services and referrals to reemployment services and training, as
		appropriate, to support the claimant 's return to work:minutes
	vi.	Other activities:minutes; please specify type of
		activities:
	b. With reg	gard to any of the above activities, do you have any best practices or

- b. With regard to any of the above activities, do you have any best practices or lessons learned to share?
- 5. Are claimants encouraged or required to complete any of the core RESEA program components before appearing for initial RESEA session? If so, what components/activities are completed and why?
- 6. Is the initial RESEA session conducted entirely in a one-on-one session with AJC staff or is some portion conducted in a group setting (e.g., an orientation to AJC services)? If any of the activity is conducted other than one-on-one with staff, which of the following activities are provided in a group versus a one-on-one setting:
 - Labor market and career information that addresses the claimant's specific needs;
 - Enrollment in Wagner -Pevser Act-funded Employment Services;
 - Information and access to American Job Center (AJC) services and referrals to reemployment services and training, as

- appropriate, to support the claimant 's return to work
- Other
- 7. Can any portion of the initial RESEA session(s) be conducted virtually or via the telephone with agency staff? If so, how and under what circumstances?
 - a. What activities of the initial RESEA can be conducted virtually or via the telephone?
 - b. If virtual, what technology is used (e.g., Skype, Zoom, FaceTime, or other similar products)? Please briefly discuss how this technology is used.
 - c. If available, about what proportion of initial RESEA sessions are partially conducted virtually or via the telephone?
 - d. In what ways has your program's use of remote provision of services changed in response to the COVID-19 pandemic?
- 8. Is there variation in the way in which the initial RESEA session is conducted or the content of the session week to week or by claimant characteristics (e.g., those with high likelihood of exhaustion are provided more intensive or additional services)? Please discuss.
- 9. Do RESEA participants typically attend an orientation to AJC services with other AJC customers, or is there an orientation for RESEA participants only? Is the orientation to AJC services a standalone meeting or is it just one component of the RESEA session?
- 10.Did your local RESEA program make any [Note: Probe changes to how the meeting is conducted (e.g., in-person/phone/videoconference) and/or the mix of reemployment services provided.]changes to the initial RESEA session in response to COVID-19 pandemic? If yes, please discuss changes and extent to which COVID-19 pandemic may have resulted in permanent changes to the initial RESEA session. other
- 11. Other than initial and subsequent RESEA sessions, are the services available to RESEA participants by this AJC different from the standard array of services provided to other job seekers using the AJC? For example, other than the in-person meetings with RESEA staff, are there other types of re-employment services that are specifically targeted on RESEA participants (e.g., on-line services; self-services; job readiness workshops, job clubs)? Please describe.
- 12. Have you seen spill-over benefits of the RESEA program for other non-RESEA customers?
 - a. To what extent has the development of RESEA programming tools/practices influenced services provided to AJC customers?

[Note to Interviewer: Collect documentation of best practices, if available.]

E. Subsequent RESEA Session

[The UIPL 07-19 Guidance: Requirements for the subsequent RESEA session with a UI claimant, if provided, must include, at a minimum, a UI eligibility assessment and review and/or update of the claimant's individual reemployment plan. The UI eligibility assessment and support, along with the development of an individual reemployment plan, must be provided on a one-on-one basis for the subsequent RESEA. However,

states may provide staff-assisted services remotely using technology such as Skype, Zoom, FaceTime, or other similar products. The level and timeliness of remote service must be comparable to assistance the individual would receive if staff were assisting such individual in-person.]

- 1. Are any RESEA participants attending the initial RESEA session scheduled for a subsequent RESEA session? [Note to Interviewer: If no, skip to next section of the discussion quide.]
 - a. If yes, what is the maximum number of subsequent sessions for which a RESEA participant can be scheduled?
- 2. Are all RESEA participants attending the initial RESEA session required to attend a subsequent RESEA session? If not, who is/isn't scheduled for a subsequent RESEA session? Who makes that decision (e.g., staff or claimant)? When is the RESEA participant scheduled for his/her subsequent session (e.g., at the end of the initial RESEA session)? How many subsequent meetings are required? What is the maximum number of subsequent meetings that can be scheduled?
 - a. If applicable (only if a 2ndsubsequent RESEA meeting is scheduled), are all RESEA participants attending the 1st subsequent RESEA session scheduled for a 2nd RESEA session? If not, who is/is not scheduled for the 2nd subsequent RESEA session? Who makes that decision?
 - b. If applicable (only if a 3rd subsequent RESEA meeting is scheduled), are all RESEA participants attending the 2nd subsequent RESEA session scheduled for a 3rd RESEA session? If not, who is/is not scheduled for the 3rd subsequent RESEA session? Who makes that decision?
- 3. What is the typical timing of the subsequent RESEA session(s) (i.e., during what payment week are RESEA participants typically scheduled)?
 - a. 1^{st} subsequent RESEA session: ____ payment week or __ week after the initial RESEA session
 - b. 2^{nd} subsequent RESEA session: ____ payment week or __ week after the 1^{st} subsequent RESEA session
 - c. 3rd subsequent RESEA session: _____ payment week or ___ week after the 2nd subsequent RESEA session
- 4. How are RESEA participants notified of their subsequent RESEA session(s) (e.g., online notification through UI system, email, telephone, US mail, etc.)?
 - a. How are these appointments scheduled (e.g., automatically scheduled, self-scheduled?)
- 5. Are there any other locations beside the AJC where the subsequent RESEA sessions are conducted? If yes, where else?
- 6. Are the subsequent RESEA sessions conducted entirely in a one-on-one session with RESEA staff or is some portion conducted in a group setting? If any of the activity is conducted other than one-on-one with staff, please discuss those activities.
- 7. Are claimants encouraged or required to complete any of the core RESEA program components before appearing for their subsequent RESEA session? If so, what components/activities are completed and why?
- 8. Can any portion of the subsequent RESEA session(s) be conducted virtually or via the telephone with agency staff? If so, how and under what circumstances?

- a. If yes, can the entire subsequent RESEA session be conducted virtually or via the telephone?
- b. If virtual, what technology is used (e.g., Skype, Zoom, FaceTime, or other similar products)?
- c. About what proportion of subsequent RESEA sessions are conducted virtually or via the telephone?
- d. In what ways has your program's use of remote provision of services changed in response to the COVID-19 pandemic?
- 9. Please provide a brief description of the format and content of the subsequent RESEA session. [Note to Interviewer: Check to see if there is a narrative description, handbook, and/or flow chart on the subsequent RESEA session.]
- 10. On average, how many hours/minutes does it take for a RESEA participant to complete a subsequent RESEA session? ____hours ____minutes
 - a. How much time do each of the following activities typically take:
 - i. UI eligibility assessment, including review of work search activities, and referral to adjudication, as appropriate, if an issue or potential issue(s) is identified: ____minutes
 - ii. Providing support to the claimant to develop and implement an individual reemployment plan: ____minutes
 - iii. Other activities: ____minutes; please specify type of activities:
- 11. Is there variation in the way in which the subsequent session(s) are conducted or the content of the sessions week to week or by claimant characteristics? If yes, please discuss.
- 12. Did your changes to the subsequent RESEA session in response to COVID-19 pandemic? If yes, please discuss changes and extent to which COVID-19 pandemic may have resulted in permanent changes to the subsequent RESEA session. [Note: Probe changes to how the meeting is conducted (e.g., in-person/phone/videoconference) and/or the mix of reemployment services provided. other make anylocal RESEA program

F. Failure to Report (FTR) and Enforcement

We have a few questions we would like to go over with you with regard to failure to report to initial and subsequent RESEA sessions.

- 1. About what percentage of claimants scheduled for initial RESEA sessions fail to report for such sessions?
- 2. About what percentage of claimants scheduled for subsequent RESEA sessions fail to report for such sessions?
- 3. For initial RESEA sessions, is the FTR rate fairly consistent week to week or is there a lot of variation?
- 4. What are the main reasons for FTR for the initial RESEA sessions?
- 5. What are the main reasons for FTR for the subsequent RESEA session?
- 6. What are the consequences of FTR for the initial RESEA session (e.g., loss of benefits for how long)? What is the specific penalty?
- 7. What is the feedback loop with UI on eligibility issues that are identified?
- 8. What are the consequences of FTR for the subsequent RESEA session(s) (e.g., loss

- of benefits for how long)? What is the specific penalty?
- 9. Can claimants reschedule a missed meeting? How is that done?
- 10. What is the timeframe between FTR for a meeting and holds on a claim (e.g., immediate or delayed)?
- 11. After a FTR, what does a claimant need to do to resume benefits (e.g., how is the penalty cured, such as attending the meeting)?
- 12. What, if anything, has been done at your AJC to reduce FTR in the state? Are there any plans to introduce new processes/procedures to reduce FTR in the future (e.g., the next 3 years)?
- 13. At your AJC, how would you characterize the relative balance between the emphasis on enforcement of eligibility requirements (e.g., work search, able and available) and re-employment assistance in your state? Do you feel that your AJC has more of an emphasis on enforcement or providing reemployment assistance? Why?
- 14. Did your . and extent to which COVID-19 pandemic may have resulted in permanent changes to FTR/enforcement of eligibility ruless make any changes to its failure to report (FTR) or enforcement of eligibility rules in response to the COVID-19 pandemic? If yes, please discuss changelocal area

G. Staffing

- 1. How many total staff are involved in conducting RESEAs at your AJC?
- 2. Are there any dedicated RESEA staff at your AJC (i.e., only are involved with RESEA activities)? What is the funding source for these staff?
- 3. What role (if any) do UI staff play in RESEA service delivery? Please describe.
- 4. What role do Wagner-Peyser staff play in RESEA service delivery? Please describe.
- 5. What role do WIOA staff play in RESEA service delivery? Please describe.
- 6. Do the same staff conduct eligibility assessments and provide RESEA services? Or are those tasks performed by different staff?
- 7. What, if any, effect did the COVID-19 pandemic have on RESEA program staffing for your local program? If there has been an effect, has this effect been temporary, or has the COVID-19 pandemic had longer-term/permanent effects on staffing?

H. Additional Questions on RESEA Service Delivery

- 1. Are there any elements of your RESEA program that you feel are unique or otherwise notable/innovative?
- 2. Are there any staffing, technology or process innovations or practices you've adopted that have enabled significant improvement in RESEA processes or participant outcomes (i.e., that you have not already mentioned)?
- 3. What, if any, are your biggest challenges in operating the RESEA program currently?
- 4. Which program elements do you believe are most critical to helping get UI claimants back to work most quickly?
- 5. What program elements, if any, do you believe are ineffective?
- 6. What changes do you believe would improve the RESEA program?
- 7. Have the new RESEA requirements under the BBA of 2018 and/or guidance issued by DOL (UIPLs) led to any changes in the format or content of initial or subsequent RESEA sessions [if not already discussed]? If yes, please briefly describe any changes made. Have these changes resulted in any new challenges? Please discuss.

IV. Evidence-Based Strategies and Evaluation Requirements; Technical Assistance and Guidance

[The UIPL 07-19 Guidance: Section 306 of the SSA includes a tiered -evidence approach for the RESEA program to encourage the Department to fund and states to use evidence-based strategies where they exist and to conduct evaluations and build evidence in places where needed. In FY 2023 and FY 2024, states will be required to use no less than 25 percent of the grant funds for interventions or service delivery strategies with a high or moderate causal evidence rating that show a demonstrated capacity to improve employment and earnings outcomes for program participants. For FY 2025 and 2026, states must use no less than 40 percent of funds for interventions or service delivery strategies with a high or moderate causal evidence rating. For FY 2027 and beyond, states must use no less than 50 percent of RESEA funds for interventions or service delivery strategies with a high or moderate causal evidence rating.]

- 1. Has staff at your AJC attended any webinars or reviewed any technical guidance from the state or federal government with regard to the BBA of 2018 RESEA requirements?
 - a. If yes, please briefly discuss and indicate whether webinars or guidance has been useful.
 - b. How is this type of guidance on new program requirements typically conveyed to you?
 - c. Do you or your staff have any flexibility or discretion in how these new requirements are implemented?
 - d. Is there any additional guidance that is needed by the AJC related to the new RESEA requirements?
- 2. [The UIPL 07-19 Guidance: It is USDOL's intent to use causal evidence ratings to inform the definition of "high" and "moderate" causal evidence ratings as they pertain to RESEA interventions and service delivery strategies moving forward to align with the intent of the RESEA legislation.] Moving forward, do you think linking funding of RESEA programs to high or moderate causal evidence ratings is a good idea? Do you have any views on how this requirement might affect the RESEA program at your AJC?
- 3. Do you have any final views about the BBA of 2018 RESEA provisions or the guidance that you have received to date on these provisions that we haven't already discussed?

We want to thank you for your time and the thoughtful responses you have provided.