

# Texas Workforce Commission

A Member of Texas Workforce Solutions

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November 1, 2012

Karen Staha

Office of Policy Development and Research Room 5641  
Employment & Training Administration, U.S. Department of Labor  
200 Constitution Avenue NW  
Washington, DC 20210

Dear Ms. Staha:

Texas submits comments in reply to U.S. DOL's comment request for information collection for the Workforce Investment Act (WIA) Management Information and Reporting Systems published in the September 26, 2012 Federal Register.

As you know, Texas has been one of two states piloting the Workforce Investment Streamlined Performance Reporting System (WISPR) since 2006. During that time we have worked closely with Pennsylvania (the other state piloting the WISPR) and DOL to try to help perfect WISPR so that it can become the common reporting system for DOL workforce system programs as it was intended to be.

Over much of the last six years TWC has looked on in dismay as DOL continued to expand existing, siloed, program-based reporting mechanisms rather than moving forward with the WISPR – especially when the American Recovery and Reinvestment Act with its additional reporting requirements created the perfect opportunity to make such a move. However, DOL did take an important step to ensure that the WISPR might one day be implemented as the next generation reporting system when it based the new Trade Adjustment Performance Report (TAPR) on the WISPR.

Now, DOL takes another such step with its proposed WIA reporting modifications. Specifically, DOL is modifying the Workforce Investment Act Standardized Record Data (WIASRD) to use the same layout, variable definitions, and data structures as the customer record format used in the WISPR. Texas strongly supports efforts to move to an integrated reporting mechanism rather than having separate systems for each program. However, TWC staff have reviewed the proposed WIASRD changes and found a number of items that we believe should be changed or modified further to better align with the WISPR and TAPR. These changes are listed in the attachment to this letter.

If you have any questions about these recommendations, please contact Adam Leonard, our Director of Performance Analysis and Reporting at 512-936-5866 or [adam.leonard@twc.state.tx.us](mailto:adam.leonard@twc.state.tx.us).

Sincerely



Larry E. Temple  
Executive Director

### **Specific Recommendations Regarding DOL's Proposed WIA Performance Reporting Changes**

Note that all of these recommendations were discussed by TWC staff and DOL staff, as well as staff from Pennsylvania and Utah as part of an effort to make sure that the WISPR had all the elements required by the TAPR, WIASRD, and Labor Exchange Reporting System (LERS). The recommendations are consistent with DOL's desire to bring WIA reporting into alignment with the WISPR. If these changes are fully implemented, the WISPR will serve as the universal job seeker record layout of which WIASRD, TAPR, and LERS are subsets<sup>1</sup>.

- 1) Remove "Observation Number" as a listed element. This element is added by DOL's automation system, not by states responsible for submitting the WIASRD.
- 2) Renumber the remaining items in Section A.01 of the WIASRD beginning with Unique Individual Identifier as #100.
- 3) State Code of Residence – There are 3 geographic data elements in the WIASRD: State Code of Residence, County Code of Residence, and Zip Code of Residence. Because it is possible for job seekers to access work force system services remotely, it is possible that job seekers are living in other countries. The geographic WIASRD provide instructions on what to code when the job seeker lives in Mexico, Canada, or "all other countries." TWC recommends that the coding values between these three data elements be consistent and thus recommend that 77 be used to record "All Other Countries" in the State Code of Residence element (rather than 00) since 777 is used with County Code of Residence and 77777 is used with Zip Code of Residence.
- 4) Element 309 for the Post 9/11 Veteran flag is a secondary veteran characteristic. It is only required if the person is a veteran, and for most WIA programs/service levels, the WIASRD reflects this. However, WIA Youth 14-18 shows it as "required" rather than "required for veterans" and TWC recommends changing it to match.
- 5) Section A.04 of the WIASRD relates to Employment and Education Information as of the date of participation. However, the existing numbering does not have room to easily insert new employment elements in the future because there is no gap in numbering. For the Highest School Grade Completed element, TWC recommends it be renumbered from 402 to 410 to make it easier to later add other employment status information variables if needed in the future.
- 6) Recent changes to the LERS required states to gather School Status at Participation information on Wagner Peyser Customers. TWC recommends that this information be reported for WIA Adult/DW customers in the WIASRD, given that most WIA customers are coenrolled in Wagner Peyser. Since the WIASRD already has a data element for School Status at Participation in Section A.08 – Additional Youth Characteristics, TWC recommends that this element (currently numbered 800) be moved to section A.04 and renumbered as 411. TWC further recommends that the remaining

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<sup>1</sup> TAPR and WIASRD would literally just be subsets where states could build a WISPR client record file and then filter the file for TAA participants/applicants and delete the non-TAPR elements or filter for WIA participants and then delete the non WIASRD elements. For LERS, states would have to resort the data elements via a crosswalk but the workgroup agreed that when LERS is next up for renewal or modification, that it be revised to more directly align with WISPR and thus WIASRD and TAPR.



elements in Section A.08 be renumbered from 801-804 to 800-803 with no other changes to the section.

- 7) TWC recommends creating space towards the beginning of Section A.09: One Stop Program Participation Information for additional growth by renumbering starting with element 902 Adult (local formula), making it number 905 and then renumbering the following elements accordingly. This will leave 902-904 available for the addition of other elements in tied to the overall Period of Participation (900 is Date of Participation and 901 is Date of Exit) in the future. TWC recommends inserting other gaps at logical points in the numbering to assist future enhancements.

The following shows TWC's recommended renumbering for section A.09:

Original #	Proposed #	Element Name
902	905	Adult (local formula)
903	906	Dislocated Worker (local formula)
904	907	Date of First WIA Youth Service
905	908	Youth (Statewide 15% Activities)
906	909	Dislocated Worker (Statewide 15% Activities)
908	910	Adult (Statewide 15% Activities)
907	911	Incumbent Worker
909	921	Rapid Response
910	922	Rapid Response (Additional Assistance)
911	923	NEG Project ID
912	924	Second NEG Project ID
913	925	Special ETA Project ID
914	926	Rapid Response Event Number
915	936	Adult Education
916	937	Job Corps
917	938	National Farmworker Jobs Program
918	939	Indian and Native American Programs
919	940	Veterans' Programs
920	941	Trade Adjustment Assistance (TAA)
921	943	Vocational Education
922	944	Vocational Rehabilitation
923	951	Wagner-Peyser Act
924	952	Referred from Wagner-Peyser to WIA
925	953	Youth Build
926	954	Title V Older Worker Program
927	955	Employment and Training Services Related to Food Stamps
928	956	Other WIA or Non-WIA Programs
929	971	Other Reasons for Exit (at time of exit or during 3-quarter measurement period following the quarter of exit)

- 8) TWC noticed an issue with the Data Element Definition/Instructions and Code Values for the new Incumbent Worker data element. If you read them, they don't actually require the customer to have been an incumbent worker. For example, the definition/instructions says "Record 1 if the participant received services financially assisted by Statewide 15% funds only." As written, anyone receiving any services financially assisted by statewide 15% funds only would be reported here, even if not an incumbent worker. TWC recommends DOL clarify the instructions and coding values for this element.

- 9) TWC recommends that Date of First Staff Assisted Core Service be moved from the beginning of SECTION C – ONE STOP SERVICE AND ACTIVITIES to the beginning of Section C.01 – Core Services and Date for First Intensive Service be moved to Section C.04 – Intensive and Training Services. The services belong in the specific subsections for those types of services. After moving these elements, SECTION C has 4 generic service elements.
- 10) TWC recommends the remaining 4 data elements for “SECTION C – ONE STOP SERVICE AND ACTIVITIES” begin by being numbered 1000 rather than 990 to better distinguish this section from SECTION B.
- 11) TWC recommends that the Date of First Staff Assisted Core Service element moved from the beginning of SECTION C be put at the beginning of Section C.01 and renumbered as 1020. TWC further recommends that the WIASRD not show that this element is required for WIA Youth customers since youth services are not classified as core or intensive.
- 12) TWC recommends that the remainder of the section be renumbered from 1022 to 1027 (1021 is reserved for Most Recent Date Received self-service Workforce Information Services which is used in the WISPR but not the WIASRD – though it could be reported in the WIASRD as well). The following shows TWC’s recommended numbering for Section C.02:

Original #	Proposed #	Element Name
992	1020	Date of First Staff Assisted Core Service
1000	1022	Most Recent Date Received Self-Services/ Informational Activities
1001	1023	Most Recent Date Received Career Guidance Services
1002	1024	Most Recent Date Received Workforce Information Services
1003	1025	Most Recent Date Received Job Search Activities
1004	1026	Most Recent Date Referred to Employment
1005	1027	Most Recent Date Received Other Staff-Assisted Core Services

- 13) Similarly, TWC recommends moving Date for First Intensive Service to Section C.04 – Intensive and Training Services and numbering it as 1200 since it is the “first intensive service”. TWC further recommends that the WIASRD not show that this element is required for WIA Youth customers since youth services are not classified as core or intensive. TWC then recommends renumbering Most Recent Date Received Intensive Services as 1201 and this would be the last change for Section C.04:

Original #	Proposed #	Element Name
993	1200	Date of First Intensive Service
1200	1201	Most Recent Date Received Intensive Services

- 14) In Section D.01 – Employment and Job Retention Data, DOL has proposed to add elements for the industry code of employment in the 1<sup>st</sup>, 2<sup>nd</sup>, 3<sup>rd</sup>, and 4<sup>th</sup> quarters after exit. TWC does not object to adding the elements but suggests locating and numbering them differently. The WISPR customer record and the TAPR already have an element for the industry code of employment in the 2<sup>nd</sup> quarter after exit. That element is placed near the end of Section D.01 after the elements associated with the 4<sup>th</sup> quarter after exit rather than up with the 2<sup>nd</sup> quarter elements. Since the



WISPR/TAPR already have the element for the 2<sup>nd</sup> quarter, TWC recommends putting all the elements together at the end of Section D.01.

When DOL and TX, UT, PA state staff were reviewing the proposed WIASRD elements and how to incorporate them into the WISPR and TAPR files, we agreed that we should not change the order of any existing elements required by the TAPR. This is because DOL has done significant programming for eDRVS associated with the TAPR. If we were to move anything, it would mean eDRVS changes and all other states would have to modify their TAPRs. Putting the new elements at the end of Section D.01 will put related elements together, avoid TAA-related changes to eDRVS and state TAPRs and keep the WIASRD consistent with the TAPR and WISPR.

The following is TWC's recommended numbering for these elements:

Original #	Proposed #	Element Name
1507	1514	Industry Code of Employment 1st Qtr After Exit Quarter
1510	1516	Industry Code of Employment 2nd Qtr After Exit Quarter
1513	1517	Industry Code of Employment 3rd Qtr After Exit Quarter
1516	1518	Industry Code of Employment 4th Qtr After Exit Quarter

Note that 1515 is reserved for "Occupational Code of Employment 2nd Qtr After Exit Quarter (if available)" which is included in the TAPR and belongs with the element for Industry Code in the 2<sup>nd</sup> Qtr After Exit.

- 15) Element 1705 has a typo in the data element definitions/instructions in that it references element 1706 twice.
- 16) TWC recommends renumbering Section E – Data Validation Elements from 5000-5005 rather than 5100-5105 to be consistent with how the elements are numbered in the WISPR.