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The Wisconsin Bureau of Workforce Training (BWT) and its WIOA partners appreciate the opportunity to comment on the WIOA Common Performance Reporting Information Collection Activity. We recognize and are thankful for the tremendous amount of effort put into development of the report templates and the WIOA performance accountability system by our federal partners at the Departments of Labor and Education. We respectfully make these comments with the intention of assisting our federal partners in constructing the strongest performance accountability system possible that provides our stakeholders with great value and maximum clarity. The Bureau is submitting comments on the WIOA Common Performance Reporting Information Collection Activity on behalf of the state's Performance Advisory Committee and program staff. Wisconsin's WIOA Performance Advisory Committee is comprised of data analysts, program experts and management personnel brought together to address the implementation and subsequent operation of the WIOA performance accountability system in a collaborative and joint manner among Wisconsin's WIOA core and partner programs. The committee's membership includes representatives from state and local partners covering each partner program including Title I Adult, Title I Dislocated Worker, Title I Youth, Title II Adult Education Family Literacy Act, Title III Wagner Peyser Employment Services, Title IV Vocational Rehabilitation, Trade Adjustment Assistance Act, Jobs for Veterans State Grant program and the state's Unemployment Insurance Division. Members from each WIOA core and partner program participated in the development of these questions and public comments.

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Wisconsin's Department of Workforce Development Comments to Joint Performance ICR

Part I. Supporting Statement

1. Among the **Primary Performance Indicators for the WIOA ETP Performance Report** (p. 8) is the inclusion of individuals in the program of study who are not WIOA participants. The collection of this data, and the data sharing agreements necessary for this collection, will pose a burden on all training providers, but a unique burden on training providers without systems presently in place to gather and report the details. This may establish a barrier to entry for emerging training programs of a specialized nature in response to rapid technologic changes.
2. The opportunity to compare the effectiveness of identical training provided to WIOA and non-WIOA participants is a noble cause. That said we anticipate an overall decrease in the number of training programs either sustained on the ETPL or offered as new programs because of the limited value returned to the training provider compared against the cost of gathering and distributing the data. The consequence of a desire for comparative data

manifests a cost shift to the training provider.

3. The explanations from the list of new data elements (p. 10) mention the following:

a. The **description of the training provider** "may include accreditation". We would benefit from a list of recognized and approved accreditation bodies.

b. We presently gather and use **program prerequisites** in a narrative form. ETA-9171 shows coded values, but the six fields available are not a match for the specific prerequisites expressed in current practice by training providers. We also use this prerequisite field to explain the difference between generally-available training programs to any training seeker, and those training programs restricted only to Registered Apprenticeship candidates under contract.

c. The **specific name of a certificate** is captured in a text field, but would certainly benefit from a coded list.

4. On the requirement to provide in the performance report the number of exits "disaggregated by the type of entity that provided the training" (p. 36), the three-year comparison won't be available until there are three years of exits for an initial cohort. The rationale to gather and report this field is unclear.

Part II. Joint Participant Individual Record Layout (ETA – 9170)

1. Data Element 1811: Please clarify this data element is only reported during a program year in which the participant is enrolled in education or training. This clarification will address situations when participants that receive education or training in one program year and continue participation through non-training services in subsequent program years.

2. Data Elements 903/904/918: We recommend adding a "Reportable Individual" option for the Adult, Dislocated Worker and Wagner Peyser programs. Wisconsin experiences most of its reportable individuals in the Wagner Peyser Program triggered by self-services.

3. Data Element 923: Please clarify whether 07-Criminal Offender is only a valid option for Title II Adult Education, consistent with written guidance, or whether participants who are dual enrolled in this Title II program and another program may use this "Other Reason for Exit" code.

4. What are the documentation requirements for reporting an individual with any of the barriers to employment? Individuals with barriers to employment affect the statistical adjustment model and should have a clear standard of documentation. Some indicators are self-attested and do not impact the decision to enroll the participant or which services are provided. These indicators should not require documentation. Other elements that impact decisions for eligibility for services and have performance accountability impacts should have clear documentation requirements.

5. Data Element 907: "Incumbent Worker Training" Rapid Response state funded should be a category because Dislocated Worker reserve funds can be used to provide incumbent worker training. The Dislocated Worker Reserve (25% of a state's allotment) is a distinct fund source from the statewide (15%) category. We request a category for funding from Rapid Response related activities (Sec. 134 (a) 2.A.i.) is added as an option to Data Element 907.

6. PIRL Element 1807: "Date of Most Recent Measurable Skill Gains: Postsecondary Transcript/Report Card" requires a post-secondary transcript or report card demonstrating achievement of the state unit's policy for academic standards. In current guidance, achievement of a post-secondary degree is not a method to demonstrate a measurable skills gain. This element should allow collection of a post-secondary degree in addition to the postsecondary transcript/report card because achievement of the post-secondary degree is the culminating point to which the transcript/report cards lead. Allowing a post-secondary degree to satisfy this data element reduces the reporting burden placed upon states and individual participants because obtaining official university transcripts typically have fees associated with the process.

7. PIRL Element 1807: "Date of Most Recent Measurable Skill Gains: Postsecondary Transcript/Report Card" requires the semesters to be consecutive and within the same program year to count as a measurable skill gain in that program year. The consecutive semester requirement does not facilitate the option to take summer and winter term courses at many post-secondary institutions. Additionally, the requirement that the two semesters must be in the same program year does not facilitate the need to enroll program participants into education at the earliest possible time. An example is the Dislocated Worker, who is laid off in December and enrolled in education in January. This participant would be required to make a measurable skill gain before July in a course that may only have offered a single semester before the end of the program year. Field providers are likely to delay enrollment in education or divert the participant from educational offerings because of this provision. This behavior is often to the detriment of the individual and business that need trained individuals in a timely manner.

8. Data Elements 203 through 209: We request the Department of Labor Employment Training Administration clarify the necessity for collecting these elements. Without a clear purpose we believe these elements regarding an individual's disability and services received are not necessary for collection for WIOA performance accountability system purposes. We feel that a number of clients will perceive these elements as excessively invasive and will not pursue our workforce programs.

Part III. WIOA Statewide and Local Performance Report Template (ETA – 9169)

1. Where are "Reportable Individuals" reported on ETA - 9169? How are unique "Reportable Individuals" who have multiple "Reportable Individual" episodes reported in the count? Do they count one time or multiple times as a reportable individual?

2. If an individual is enrolled in both secondary and post-secondary education, which condition must they meet in order to qualify for the credential attainment rate numerator? For example, a Youth participant begins the period of participation in secondary education and achieves a secondary school diploma. The same participant becomes enrolled in post-secondary education later during the participant period. The post-secondary education period extends past the exit date but ends soon after the exit date without achievement of a recognized post-secondary credential. Does the participant need to receive a recognized post-secondary credential within 1 year after exit to qualify for the Credential Attainment Rate numerator? Does the achievement of the secondary school diploma and enrollment in education within one year after participation qualify for the Credential Attainment Rate numerator?

Part IV. Appendix C - WIOA Statewide and Local Performance Report Specifications.

1. #28 Credential Rate Denominator Calculations. The specifications should distinguish between the Adult and Dislocated Worker Program and the Youth program based on inclusion definitions discussed in guidance. Participants in the Adult and Dislocated Worker Programs in guidance can only qualify for the credential attainment rate if they receive a training service. In guidance, the option does not exist to be enrolled in secondary or postsecondary education. The definition in the report specifications includes inclusion of participants who are enrolled in secondary education or post-secondary education regardless of the program.

2. #28 Credential Rate Denominator Calculations. A participant's enrollment in short term training other than On-the-Job Training and Customized Training enters the participant into the credential attainment rate denominator. Many of these short term training options do not lead to a recognized postsecondary credential however meet an employer's need for talent quickly. Additionally, there are many vocational rehabilitation training services that are valuable for the individual but does not lead to a credential such as training designed to assist an individual cope with their disability. We recognize balancing the long term need for individuals through promotion of courses that lead to recognized post-secondary credentials however, see value in short term training that offer certificates recognized by employers. We propose the indicator counts only those participants who are in training or education that leads to a postsecondary credential.

3. Measurable Skills Gain Denominator Report Item #8 for the denominator for "satisfactory or better progress report..." method of achieving a measurable skill gain requires participants to have a training type of On-the-Job Training or Apprenticeship Training or Type of Work Experience greater than 0. Work experience does not appear as a Joint PIRL data element. ETA Specific PIRL Data Element 1205 is Type of Work Experience. The data element should be added to the Joint PIRL or the indicator's specifications should differentiate applicability between DOL ETA WIOA programs and the Vocational Rehabilitation program.

4. The Measurable Skills Gain denominator for educational function level gain does not limit the population to those who have received secondary education at or above the 9th grade level. Additionally, guidance in TEGL 10-16, TAC 17-01 and OCTAE Memo 17-2 do not include the prerequisites for participants to be an English Language Learner or Basic Skills Deficient. We request clarification between the guidance and the written specifications.

Part V. ETA 9171 ETP Definitions

1. We see great potential in the use of the CIP taxonomy (Data Element 104), first as a stand-alone for direct comparison of similar training programs, and ultimately as a comparative tool for outcomes when cross matched against ONet or SOC codes. The adoption of and improvements to the fidelity of CIP coding will be a key factor. Revisions and updates to CIP codes resulting in updated CIP tables may complicate updates to current training program data. We expect this to be a bumpy ride at first.

2. The All Student data elements present a challenge, specifically elements: 113, 114, 115, 116, 118, 119, 120, 121, 122, 137 and 138.

Part VI. Other Comments

1. The "WIOA PERIODS FOR REPORTING COHORTS" document from the previous Joint ICR should be added to this ICR because in written guidance a 2 quarter lag is referenced. The approved ICR has a 3 quarter lag following the time required outcomes to manifest. This discrepancy should be clarified in this amended ICR.

2. The Measureable Skills Gain cohort should be based off of the participant's anniversary date to provide adequate time to make a measurable skill gain. The measurable skills gain timeframe parameters of the program year do not permit flexibility in training options for participants that may enter the program at various parts of the program year. Using an anniversary date as a deadline to achieve a measurable skill gain provides a more accurate assessment of the program's effectiveness to assist its participant's in achieving a measurable skills gain.

3. When basic career services are provided in the one-stop to reportable individuals who are not participants in a specific program, or who are co-enrolled in multiple programs, what is the determining factor in deciding which

program to assign the service for reporting and performance purposes? Is it the program funding the career counselor (staff) who provided the service? Is it the program that the customer is enrolled in, regardless of who provides the service? Some other criteria?

Credentials Calculations A+ C/ B+D

	Joint Guidance Calculations Provided	Comments
Postsecondary Numerator: A	<p>Of all those included in the denominator:</p> <p>Date attain credential during program participation, or within 1 year after exit, or exit date (353):</p> <ul style="list-style-type: none"> • Associate's degree (87) • Bachelor's degree (88) • Master's degree (89) • Graduate Degree (90) • Vocational/technical license (93) • Vocational/technical certificate (94) • Other recognized diploma/degree/certificate (95) • Date attain post-exit recognized credential (377) <p><u>AND</u></p> <p>The type of credential attained is recognized as a post-secondary credential.</p> <ul style="list-style-type: none"> • Same as above and • Type of recognized credential post-exit indicated.(378) 	
Postsecondary Denominator: B	<p>Exited during the reporting period (353)</p> <p><u>AND</u></p> <p>At least one type of training service in which enrolled is considered post-secondary: (elements look at services provided by VR Agency in-house or purchased for the following)</p> <ul style="list-style-type: none"> • Occupational/Vocational (150,151) • Registered apprenticeship (164) • Basic Academic/ Remedial or literacy training (170,171) • Job Readiness Training (177, 178) • Disability related skills training (184,185) • Other training (191,192) • Randolph Shepard Training (198,199) <p><u>OR</u></p> <p>The participant participated in postsecondary education "Yes- Enrolled in Postsecondary education data element" (84) except those with exit reasons:</p> <ul style="list-style-type: none"> • No longer available as in prison/jail (1) • Health/medical (2) Death (3) Reserve forces active duty (4) Foster care (5) Ineligible (6) • Criminal offender (7) No disability (8) 	<p>Most of these appear to not be postsecondary and do not lead to a recognized credential per the RSA-911 definitions and/or are not postsecondary training. Unless there was another element to identify those that are not considered postsecondary you would be including individuals in the denominator who should not be and do not have an intent of gaining a credential and may not be necessary or appropriate for them to. Should it instead be:</p> <ul style="list-style-type: none"> • Graduate • Four year college • Junior/community • Registered apprenticeship <p>If end up including those listed originally, why not included comparable benefits data elements? Understanding is that does not have to be VR funded. Many times there may not be a financial need or provided by another funding source.</p> <p>Would be cleanest to only use element 84</p>

	<ul style="list-style-type: none"> No impediment to employment (9) Does not require services (10) Disability too significant to benefit (11) No long term source of extended services (ineligible) (12) Extended employment (15) 	<p>to indicate that indeed they are in postsecondary training. Should element 92 be included? (enrolled in career or tech leading to credential) Does exit reason pertain to first grouping as well?</p>
Secondary Numerator C	<p>Of all the participants included in the denominator: The date on which a participant attains a credential occurs during participating in, or within 1 year after program exit (353)</p> <ul style="list-style-type: none"> Secondary school diploma (81) Secondary school equivalent (82) <p>AND They type of credential attained is recognized as a Secondary School Diploma/equivalent</p> <p>AND The participant "enrolls in a post exit education or training program leading to a recognized postsecondary credential" (376) (353)</p> <p>OR The participants employed after exit: 1st (379); 2nd (383); 3rd (386); 4th (389)</p>	<p>Does enrolling in a program prior to exit and continuing post exit not count? Does this scenario throw them into the post-secondary denominator so on hook for attaining a post-secondary degree and not get credit for secondary?</p> <p>Would these individuals count twice in denominator against the measure?</p>
Secondary Denominator D	<p>Exited during the reporting period (353)</p> <p>AND At least one type of training service in which the participant was enrolled is considered "secondary" in conjunction with Training</p> <ul style="list-style-type: none"> Basic Academic Remedial (170,171) <p>OR The participant was "enrolled in Secondary Education Program at Program Entry" (78), except those that exit for following reasons:</p> <ul style="list-style-type: none"> No longer available as in prison/jail (1) Health/medical (2) Death (3) Reserve forces active duty (4) Foster care (5) Ineligible (6) Criminal offender (7) No disability (8) No impediment to employment (9) Does not require services (10) Disability too significant to benefit (11) No long term source of extended services (ineligible) (12) Extended employment (15) 	<p>Should basic academic remedial be considered in this denominator? Remedial training does not appear to lead to a diploma by definition so would be including people in denominator should not be. Should it be miscellaneous training as to capture GED and secondary school? But then how know if intent is to get a diploma/ credential vs. other types of training? Does exit reason pertain to the services provided group also?</p> <p>If service recorded as comparable benefit does it not count?</p> <p>Should data element 80 also be included as an enrolled in date for a type of secondary education?</p>

Measurable Skills Gains

	Joint Guidance Calculations Provided	Comments
Numerator	<p>Of all the participants in the denominator: The unique count of the <u>most recent date</u> which on participants achieved a Measurable Skill Gains is in the reporting period, via one of the following:</p> <ul style="list-style-type: none"> • Educational Functioning Level (343) • Postsecondary Transcript/Report Card (345) • Secondary Transcript/Report Card (344) • Training Milestone (346) • Skills Progression (347) 	<p>Where would secondary credential attainment fall under? Data element does not discuss attainment of the diploma. Should element 81 & 82 be included?</p> <p>Can the attainment of a postsecondary credential count as a measurable skills gain?</p> <p>Does the completion of a work experience, job shadow, summer intern count as measurable skills gain. Appendix C of the WIOA Statewide Performance Report Template suggest that work experiences get counted in the denominator, so does achievement of those count as measurable skills gain?</p>
Denominator:	<p>All participants enrolled in an education or training program leading to a recognized postsecondary credential or employment except those that exit</p> <ul style="list-style-type: none"> • Date Enrolled During Program Participation in and Education or Training Program Leading to a Recognized Postsecondary Credential or Employment (85) • except those that exit (355) for specified reasons No longer available as in prison/jail (1) Health/medical (2) Death (3) Reserve forces active duty (4) Foster care (5) Ineligible (6) Criminal offender (7) No disability (8) No impediment to employment (9) Does not require services (10) Disability too significant to benefit (11) No long term source of extended services (ineligible) (12) Extended employment (15) 	<p>What is considered education or training program- should this be all RSA training service listings? What about work experiences as listed in Appendix C of the WIOA Statewide Performance Report Template? Other information shared with state indicates work experience and work readiness trainings do not count. Is this up to states to decide when they flag this? Further guidance is needed.</p> <p>Does it matter if they are indicated as English language learner or basic skills deficient as listed in Appendix C of WIOA Statewide Performance Report Template?</p> <p>Measurable skills gain indicator is calculated as the gains occur, not an exit based measure. How does the exit reason tie into the calculation? How does exit reason tie into this.</p> <p>If a state gets credit for measurable skills gains and then closed years later for a reason listed below how will that be calculated and impact previous performance?</p> <p>How does a participant get taken out of the measure if they withdraw so it does not count against a state for the life of the case?</p>

The calculations provided in the Joint Guidance and the Statewide Performance Report, item description 30 & 31, do not align with the calculations provided in the WIOA Measurable Skills Gains Report Template items 1-10.