<u>**WIOA Performance Workgroup Joint Comments**</u>

Workforce Innovation and Opportunity Act (WIOA) Common Performance Reporting
OMB Control Number 1205-0526
Requested Comments

ETP/Eligible Training Provider Reporting observations and comments regarding the ETA 9171:

• #101 Type of Entity - The reportable values are: 1 = Higher Ed: Associate's Degree 2 = Higher Ed: Baccalaureate or Higher 3 = Higher Ed: Certificate of Completion 4 = National Apprenticeship 5 = Private Non-Profit 6 = Private For-Profit 7 = Public 8 = Other

<u>For Data Element 101, Type of Entity</u>, duplicative code values are provided which is confusing. Community colleges can be reported as code value 1, as the majority of the credentials awarded are associate's degrees; as code value 3, as another significant number of credentials awarded are community college certificates of completion; and occasionally even code value 4, apprenticeship programs. Are we to choose all that apply? This is potentially confusing.

We would agree with Maryland's proposed revision to this data element that accounts for the above-cited situations:

Data Element 101: <u>**Type of Entity**</u> (reference: 20 CFR 680.410)

1 = Private Vocational or Career School (awards below associate degree)
2 = Community College
3 = Two-year Private Technical School (awards associate degrees)
4 = Four-year College or University
5 = Registered Apprenticeship Sponsor/Provider
6 = Secondary School
7 = Public Adult School with Occupational Program
8 = Other Private Non-Profit Provider
9 = Other Private For-Profit Provider
10 = Other Type of Provider

• <u>For Data Element 103, Program of Study – by potential outcome</u>, multiple code values may apply to any one program. Are states to submit multiple code values for this data element? If not this is problematic. For example, a community college certificate program (or an associate's degree program, etc.) may also have the potential outcome of an industry-recognized certificate or of a certification or a license recognized by the state or federal government, etc.

Not all programs of study are captured in the code values, e.g., community college non-credit course series ("programs") and credit certificate programs. These are distinct offerings which are the most commonly utilized by WIOA participants.

We support Maryland's proposed revision to this data element, provided below, which assumes

Multiple code selection, but is not based upon it.

- Secondary school diploma/.GED concurrent or combined with occupational training, et al
- Measureable skill gain leading to a credential
- Measureable skill gain leading to employment
- Registered apprenticeship certificate of completion
- Industry-recognized certificate or certification
- Community college non-credit completion certificate
- College/university credit certificate below a baccalaureate (e.g., lower division collegiate certificates)
- Private vocational/career school certificate
- Associate's degree
- Baccalaureate degree
- State or federal license
- Employment

As a general issue, our community colleges offer many programs of study as identified by CIP, very few of which are accessed by WIOA participants in a given year, and the programs chosen by WIOA participants will change from year to year. In measures asking for all individuals, would programs (by CIP) not accessed by WIOA participants be included? If not, then from year to year, comparing the outcomes would be inconsistent. If the expectation is to provide all of this data individually for each program of study offered and accessed, then the reporting requirement becomes unduly burdensome.

• #115 - All individuals: Median Earnings – This is consistent with all reporting; however, #137 – All Individual Average Earnings (Q2) and #138 -- All Individual Average Earnings (Q4) – This is not statutorily required and this is a totally different calculation than #137. No other program has to report this, so why is this required for ETPL reporting? Additionally, community colleges have great difficulty gathering employment and wage data for students, the sample size is often lower than the threshold allowing the Maine Department of Labor to provide the figures, particularly if broken down by program of study.

• #123 – Cost Per WIOA Participation Served (to be completed by states) – Can program accounting systems provide this information considering that this report is not by the provider it is by the program? This may be hard to obtain because fiscal management systems and program management systems are not the same.

• #128 – URL of Training Program – This is a lot of maintenance at the program or provider level. This data will need to be updated at least quarterly or biannually to ensure URLs are correct. Each time a program is removed, the URL will need to be removed as well. This is burdensome and will take significant time to ensure that the data are correct.

• #129/130 – Out-of-Pocket Costs – Variations in program requirements will require that this be calculated by individual program. Variations in preparation by student result in no true "normal time to completion."

• #131 – Program Length (Clock/Contact Hours) – How are clock hours and credit hours differentiated? Again variations in student preparation upon entry affect program length on an individual basis.

• #135 – Name of Associated Credential –The 75 character limit is a concern. Some credentials have far more characters than the allowable limit.

• #136 – Reciprocal Agreements with Other States (to be completed by states) – Are all states with reciprocal agreements to be listed or only those in which the specific program is included in a reciprocal agreement? Needs to be clarified. How is this to be implemented?

• #137/138 - All Individuals: Average Earnings – Community colleges have great difficulty gathering employment and wage data for students, as numbers are often lower than the threshold allowing the Maine Department of Labor to provide the figures, particularly if broken down by program of study.

• #139 - O*NET-SOC Code Associated with Program #1, 140 - O*NET-SOC Code Associated with Program #2 and 141 - O*NET-SOC Code Associated with Program #3 –Concern is that for existing programs on the ETPL, an SOC code is needed. This is a huge time burden to obtain and input the missing SOC codes, not previously required.