

### **WIOA Performance Workgroup Joint Comments**

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

For Data Element 101, Type of Entity, duplicative code values are provided which is confusing. Community colleges can be appropriately recorded as code value 1, as the majority of the credentials awarded are associate's degrees. Community Colleges can also be appropriately recorded as code 3, as the majority of the credentials awarded are a community college certificates of completion. RTI would fall under National Apprenticeship, and often Community College. This situation expectedly will lead to inconsistent reporting by states.

In addition, common occupational training providers are not specifically included among those listed for this data element, and their contribution to workforce development in this country should be identified and reported. Two such providers are private vocational/career schools and two-year private/technical schools.

Also, WIOA makes allowance for secondary schools as potential eligible training providers when their diplomas are offered in conjunction with occupational skills training (et al), but they are not specifically captured via the code values.

Below is a proposed revision to this data element that accounts for the above-cited situations.

Data Element 101: **Type of Entity** (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

When an institution is a Private For-Profit that leads to an associate's degree what value is to be reported?

• For Data Element 103, Program of Study – by potential outcome, multiple code values may apply to any one program. Of course, this situation is not problematic if states may submit multiple code values for this data element. Otherwise, the situation 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.)

Further, some programs of study are not clearly captured via the code values, e.g., private vocational/career school training programs and community college non-credit course series ("programs") and credit certificate programs. These are distinct offerings which are the most commonly utilized by WIOA ITA participants in Maryland and likely many other states.

In light of the above, a proposed revision to this data element is provided below, which assumes Multiple code selection, but is not based upon it.

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

Secondary school diploma/.GED concurrent or combined with occupational training, et al

Industry-recognized certificate or certification

State or federal license

Measureable skill gain leading to a credential

Measureable skill gain leading to employment

Employment

Registered apprenticeship certificate of completion

- #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?
- #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.
- #131 – Program Length (Clock/Contact Hours) – How are clock hours and credit hours differentiated?
- #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?
- #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.
- On page 8 of the Supporting Statement, it is stated that the States will submit their ETP data through DOL WIPS in a comma delimited file. Is WIPS prepared to take the file? WIPS has failed to produce appropriate reports for both quarter 1 and quarter 2 reporting. If the system is not functioning in time, will states be held accountable for the information, while the system is being corrected?

**WIOA Annual Statewide performance Report and Local Area Performance Report Template specifications (ETA 9169) and WIOA Joint PIRL (ETA 9170) comments:**

- Annual Narrative has an established 25 page limit attached. Do the 25 pages include or exclude the Statewide and Local Area Reports? If these reports are included, the limit is basically exceeded. Please clarify.

- Annual Narrative will include the Employer Metrics, both the metric being piloted and any additional metric the State is using. It is not clear if a sentence detailing the measures and the rates are required or if the table listed under the Joint PIRL must be utilized.
- The Supporting Statement and corresponding reporting template (Statewide Performance Report) does not clearly identify if report is by individual Programs or jointly submitted across all 6 core programs? A checkbox is listed that allows Title I and Title III to be submitted together. Are the funds to be captured by program, captured in a way that they can be combined to accurately determine the cost per service, especially given that participants are duplicated when crossing over programs?

If we share data internally across programs, and each program has established data validation tools that differ, which barrier should be used? If WIOA Title I has a participant listed as a veteran, and Rehabilitation indicates that the same individual is not a veteran, which agency overrides the other in reporting?

- Cost Per Participant Career Service and Cost Per Participant Training, will include overlap. Cost per participant career service is defined as  $\text{FUNDS EXPENDED (CAREER SERVICES)} \div \text{PARTICIPANTS SERVED (CAREER SERVICES)}$ , while Cost Per Participant (Training) is defined as  $\text{FUNDS EXPENDED (TRAINING SERVICES)} \div \text{PARTICIPANTS SERVED (TRAINING SERVICES)}$ .

The Cost Per Participant Career Service will include any participant with a career service, however some may have also received training during this same time frame. How then would the funds be differentiated between Career and Training?

- Percent Co-Enrolled is defined as  $\text{Count of UNIQUE RECORDS where ((Funding Stream) and (Date of Program Entry} \leq \text{end of the report period) and (DATE OF EXIT} \Rightarrow \text{beginning of the report period or is null)) and (FUNDING STREAM) = 1 for any other funding stream))} \div \text{Count of UNIQUE RECORDS where ((Funding Stream) and (Date of Program Entry} \leq \text{end of the report period and (DATE OF EXIT} \Rightarrow \text{beginning of the report period or is null))} \times 100$ .

Information collected on Rehabilitation, Adult Education, Youth Build, Job Corp, etc. listed in the DOL PIRL, basically these are partners not using the same reporting system, the program identification will be staff identified, not system sharing validated. This means the data are underreported for many states where systems are not shared. How are program files combined if these programs are not sharing the same 12-digit identifier, because it is not required? How are States to determine Number Co-Enrolled and Number of Participants with barriers to Employment served by each of the core programs?

- Field 1401 under the Joint PIRL Tab Changes, list field 1401 to be renamed “Enrolled in Secondary Education Program” removing “at Program Entry”. We agree with the deletion of “at Program Entry” because the definition is allowed during participation. Because the new

definition listed has GED and other High School equivalent indicated, the name of the field should reflect the new definition. How about, “Enrolled in Secondary Education, GED or High School Equivalent Program;” this more closely reflects the definition listed.

- Measurable Skill Gains is listed as the *Count of UNIQUE RECORDS from MEASURABLE SKILLS GAIN DENOMINATOR where the most recent date of either (the Date of Most Recent Measurable skill gain: Educational Functioning Level (EFL) or the (DATE ATTAINED RECOGNIZED CREDENTIAL is within the reporting period and TYPE OF RECOGNIZED CREDENTIAL = 1) or the DATE OF MOST RECENT MEASURABLE SKILL GAINS: SECONDARY TRANSCRIPT/REPORT CARD or the DATE OF MOST RECENT MEASURABLE SKILL GAINS: POSTSECONDARY TRANSCRIPT/REPORT CARD or the DATE OF MOST RECENT MEASURABLE SKILL GAINS: TRAINING MILESTONE or the DATE OF MOST RECENT MEASURABLE SKILL GAINS: SKILLS PROGRESSION) is within the reporting period. Divided by Count of UNIQUE RECORDS Where (Funding Stream) and ((DATE OF PROGRAM ENTRY is not null) and (DATE OF Program Entry <= end of report period) and (DATE OF EXIT is null or within the report period) and (DATE ENROLLED DURING PROGRAM PARTICIPATION IN AN EDUCATION OR TRAINING PROGRAM LEADING TO A RECOGNIZED POSTSECONDARY CREDENTIAL OR EMPLOYMENT (WIOA) in not null) and (OTHER REASON FOR EXIT = (00 or 07).*

If a participant is in a program for more than one program year, and the training ended during the first program year, a gain in the first and second program year is still needed in order to be a positive for this measure for each year the participant is active (not based on training dates, but participation dates). Also, if the most recent date is utilized, a date for one program year could overwrite a date for a prior program year. The extract would therefore not contain historical data of the first gain in the next program year reporting.