

Pennsylvania Department of Labor & Industry
Response to:
U.S. Department of Labor's Request for Comments on the
Workforce Innovation and Opportunity Act (WIOA) Common Performance Reporting
OMB Control No. 1205-0526

The Pennsylvania Department of Labor & Industry (L&I) appreciates the opportunity to comment on the proposed amendments to the information collection request (ICR) by the U.S. Departments of Labor (DOL) and Education (ED) titled "Workforce Innovation and Opportunity Act (WIOA) Common Performance Reporting." The following recommendations are in response to this ICR.

Annual Statewide Performance Report Narrative

The "Annual Statewide Performance Report Narrative" guidance in the supporting statement contains a lengthy list of potential data collection elements and an anticipated federal guidance document. Given the unknown nature of which data elements the agency will capture, the timing of federal guidance is critical in the provision of the requested items. Training and Employment Guidance Letter 07-15, which provided Workforce Investment Act (WIA) Program Year (PY) 2014 Annual Report Narrative guidance, was not published until November 4, 2015, although states had been preparing for an October 1, 2015 submission. We respectfully request that guidance be provided as early as possible so that states can provide USDOL the best possible information.

Eligible Training Provider Performance Report

The general public is interested in whether or not a program leads to employment and the wages of that employment, the quicker the better. The clarity and quality of that information can be accomplished with Data Element 115, which displays the earnings of all individuals that have completed the training and obtained employment within six months' time. Including additional wage information (Data Elements 120, 137 and 138) will cause confusion for potential students. To minimize the burden of collection and reduce confusion of the consumers, it is recommended to eliminate 120, 137 and 138 which are additional elements not required by law.

We respectfully request that the word "individuals" in the definition for data element 117 be replaced by "WIOA participants" to align with #5 of the Primary Indicators of Performance which report the results of the indicators with respect to all WIOA participants in the program of study.

The included statement on page nine of the supporting statement for OMB Control No. 1205-0526, *The ETP Performance Report must report the results of the above indicators with respect to all WIOA participants in the program of study*, establishes that results for the listed indicators be reported for a second group consisting of WIOA participants. Data elements 118-122 create an unnecessary third group by singling out non-WIOA completers. The report now requires performance information on all individuals (combination of WIOA and non-WIOA), WIOA participants and non-WIOA completers.

Pennsylvania's training provider system is built around the actual physical training location of the program. However, data element 127 requests only the training provider's main location, which is not student friendly and will result in training choices to appear centralized rather than being available throughout the state as WIOA intends. The actual physical location is more helpful to students in making an informed choice regarding their training. Therefore, we respectfully request that data element 127 be changed to the physical location of the training.

ETA 9171 data elements 139, 140 and 141 require three different occupational (O*NET-SOC) codes for which the program prepares students. The current data element names cause confusion by including Program #1, Program #2 and Program#3. These elements should be requiring the collection of 3 occupational codes that the one program of study leads to rather than identifying it as Program #1, Program #2 and Program #3.

Using the term “individuals” and consistent use of that term to address the combination of WIOA and Non WIOA students will provide clarity and eliminate confusion.

Using the term “participants” and consistent use of that term to address WIOA funded students will provide clarity and eliminate confusion.

Using the terms “completed/completer” instead of “exited/exiter” to address the completion of training will provide clarity and eliminate confusion of exiting from WIOA.

Throughout the regulations, it is mentioned that the Departments recognize the contribution of ETPs that may serve smaller populations and acknowledge that suppression standards may limit data. It seems unnecessary and burdensome to expand the requirements for reports where many will not be able to share useful data.

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We fully support the addition of wording to support the inclusion of ‘secondary education programs or training program that leads to employment’ in the definition for data element 1811 - Date Enrolled During Program Participation in an Education or Training Program Leading to a Recognized Postsecondary Credential or Employment.