#### Comments on ETA-2017-0001-004.xls

# Amended WIOA Joint ICR WIOA Statewide and Local Perf Rep Template and Specs

# Tab: WIOA Reporting Template

<u>Funds Expended for Career Services and for Training Services (#3 and #7)</u>: Our fiscal system collects funds expended for training services for DWG funds so we can report it on fiscal report ETA-9130. Except for this, we don't have the information. Our workforce boards would like some guidance about what dollars are included. For example, is staff salary included, and if so, how would they determine what percentage of staff time was spent on Training vs. Career services?

# Tab: Funding Streams

- o Adult and Dislocated Worker: PIRL #903 or #904 have no value = 4
- o National Dislocated Worker Grants: Only disaster recovery grants are counted?

### Tab: Performance Report Specs

### - WIOA Reporting Template

- 15 Employment Rate (Quarter 2) Denominator: There is nothing in the Technical Specifications to exclude self-service-only participants.
- 17 Employment Rate (Quarter 4) Numerator: There is nothing in the Technical Specifications to exclude self-service-only participants.
- 26 Median Earnings: There is nothing in the Technical Specifications to exclude self-serviceonly participants.
- 56 Migrant and seasonal farmworkers: Includes dependents of farmworkers, which is different than the specs for ETA-9173.
- 59 Youth in foster care or aged out of system: Only includes youth aged 14-24, this is different than the specs for ETA-9173.

#### - Credential Attainment Rate

- 2 Secondary School Diploma or Recognized Equivalent Denominator: should not include
   OTHER REASON FOR EXIT = 07. See TEGL 10-16, Attachment 10, page 4: "except those that exit for specified reasons listed in PIRL 923; code value #1, 2, 3, 4, 5, 6, or 7"
- 4 Recognized Postsecondary Credential Denominator: same as above
- o 5 Numerator Totals: change "Sum of (1, 3, 5)" to "Sum of (1, 3)"
- o 6 Denominator Totals: change "Sum of (2, 4, 6)" to "Sum of (2 OR 4)"

 It's not possible for a person to be counted more than once in the numerator because only the 1<sup>st</sup> credential is considered for this measure, but it IS possible to be counted in both denominators:

The number of participants who exited and were in a secondary education program (at or above the 9th grade level) without a secondary education diploma or equivalent during the program

The number of participants who exited and were in a postsecondary education or training program during the program

It is not accurate to only consider the 1<sup>st</sup> credential attained. Although the PIRL does not specify that the 3 credentials be sorted by the date they were attained, logically, that is how most states will fill them in. Therefore, the 1<sup>st</sup> credential attained has a higher likelihood of being a secondary credential than the 2<sup>nd</sup> or 3<sup>rd</sup> credential. To get into the secondary numerator a person must also be employed or in postsecondary education within one year of exit. This is not true if the credential attained is postsecondary – they are automatically counted in the numerator.

#### - Measurable Skill Gains

- 30 Measurable Skill Gains Numerator: Includes Secondary School Diploma/or equivalency, which does not match TEGL 10-16, Attachment 10, page 6.
- Workforce Boards would like to know if any of the following count towards a Measurable Skills Gain:
  - Passage of 1 GED test
  - Taking a college entrance exam
  - Getting a food handlers certificate
- 31 Measurable Skill Gains Denominator: Once a person enters an education or training program leading to a postsecondary credential, they will be in the MSG indicator until they exit the program. Literacy Numeracy had a limit of 3 years, will MSG have a similar limit?
- 6, 8, 10 Measurable Skill Gains Denominator: 3 of the 5 denominators should include
   OTHER REASON FOR EXIT = 07. See TEGL 10-16, Attachment 10, page 6: "except those that exit for specified reasons listed in PIRL 923; code value #1, 2, 3, 4, 5 or 6"

Thank you for your consideration of these comments,

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