

Comments on ETA-2017-0001-0004.xls

Performance Report Specs Measurable Skill Gains Tab – Also Joint PIRL tab

MSG 4 - Denominator for Attainment of a secondary school diploma or its equivalent

- The definition does not specify that an individual needs to have been enrolled in a secondary education program at some point during the year in order to be included.

MSG 5-6 & MSG 9-10 Postsecondary Transcripts and Exams

See also Joint PIRL tab data element numbers 1807 and 1808

- This appears to exclude completion of a BA or general studies AA as representing a measurable skill gain. This makes no sense. If satisfactory progress in such programs counts as measurable skill gain, so should completion of these credentials, even if completion occurs in a reporting year in which the participant never attempted enough credits during the year to reach the part-time threshold. Sometimes participant circumstances, or course offerings, or other scheduling issues will place participants in the position of needing to complete courses that are too few or too unfortunately scheduled when they continue into a new reporting year.

MSG 11-13

- This produces an overall outcome rate that will double count any individual eligible for more than one of the denominators during the reporting year. The language of WIOA clearly requires that an individual only need achieve one measurable skill gain during the year, not one per type of education/training.