

## ETA 9171 – Eligible Training Provider (ETP) Definitions

**Overall Comment – There are too many new data elements added that are of relatively little use and/or poorly defined. States and providers would have to bear a substantial added burden of modifying interfaces and databases, technical assistance and training, and periodic updating or validation of this information for thousands of separate programs in a state, without providing commensurate value to participants, caseworkers or managers. The WIOA statute presents a sufficiently long list of unfunded mandates or options without inventing more. Long before a national database of programs of study should come a national exchange system to automate bilateral agreements among states for reciprocal eligibility management across stat lines. Given the paucity of additional resources available for WIOA, it must be seriously questioned whether the additional data elements in this ICR should be in competition for scarce resources with other WIOA implementation activities such as:**

- Meaningfully defining and systematically and consistently collecting data on the factors that are to be “take(n) into account” in establishing state criteria for eligible programs (WIOA sec. 122 (b)(1)( A thru J).
- Identifying and setting metrics for initial eligibility criteria (WIOA sec.122 (b)(4)(D)) that are meaningful for a program of study that applies in its first year of operation – in particular under (D)(i).
- What to do with programs that have so few exiters in their first year that there are not enough exiters to make and publish a statistically valid performance rating when their initial year expires (WIOA sec. 116 (d)(6)(C).
- Developing program evaluation systems for other types of training services under sec. 122 (h) and Sec. 123.

### COMMENTS ON SPECIFIC ELEMENTS

#### #103 - Program of study – by potential outcome

It is possible for a program to have more than one credential outcome e.g. certificate or Associates degree

#### #105 - Total Number of Individuals Served

Quarterly reporting of participant counts is not feasible for non-public programs, and a significant added burden for some public programs – to what end?

Should be changed to read “the unduplicated sum across all four quarters” if quarterly data is available  
There is a confusion between “program” and “course” information. A single course can be part of more than one program of study, and some participants enroll with no intent to take more than one or a few specific courses. For a significant number of participants the selection of a specific “program of study” occurs some time after initial enrollment, and may change repeatedly.

#### #106 - Total Number of Individuals Exited

“or transferred from this program” – again this is a level of granularity that doesn’t always exist in reality

#### 139-141 - O\*NET-SOC Code Associated with Program #1 (#2, #3)

Few providers have familiarity with SOC codes. So either state staff are going to be trained to translate program CIPS or skill or occupation descriptions into SOC, or an automated match with a CIP-SOC

crosswalk will be used. And if it is the latter, there is no reason for this not to be done at the national level.

#### ELEMENTS THAT SHOULD BE COLLECTED IN A SEPARATE REPORT

#123 - Cost Per WIOA Participant Served (to be completed by States)

All of the precedent elements are at the program of study level

#136 - Reciprocal Agreements with Other States (to be completed by states) – also a state level not program level element

Inserting an aggregate state level element here is very confusing. State level elements should be collected in a separate block.

#### EXCESSIVE BURDEN TO VALUE ADDITIONS

The following are “nice-to-have” data elements that are definitely not free.

#125 - Description of Training Program

#126 - Description of Training Provider

#128 – URL of Training Program

# 129 - Out-of-Pocket Cost for a Non-WIOA Participant: Tuition and Required Fees

#130 - Out-of-Pocket Cost for a Non-WIOA Participant: Books and Supplies

#131 - Program Length (Clock/Contact Hours)

#132 - Program Length (weeks)

#133 - Program Prerequisites

#134 - Program Format