

## **State of Kansas Comments on the ICR WIOA Common Performance Reporting**

Agency/Docket number: Docket ID: ETA-2017-0001

Federal Register Number: 2017-01069

### **Kansas Department of Commerce Comments:**

Commerce has provided comments/questions regarding common performance reporting:

- 1) Measurable Skill Gain is listed as a Primary Indicator of Performance, however, no guidance is provided on arriving at a reasonable negotiated goal for the measure or calculations to track actual results. 3141 (b)(2)(A)(i)(V) While Measurable Skill Gains was included in a recent webinar facilitated by WorkforceGPS, developing a reasonable goal to measure against was not among the topics included. Providing additional information on the Statistical Adjustment Model in relation to this indicator and/or guidance on developing goals is needed. 3141 (b)(3)(A)(iv)(II)(viii)
- 2) Credential Attainment is listed as a Primary Indicator as well, however, collection of this information has been challenging in the past. The education agency will be providing the data for those participants completing a secondary or post-secondary program in order to be included in the performance. What flexibility does the workforce agency have to ensure data exchanges are encompassing all participants for the measure? And, if measure is not met, are the sanctions applied to both the reporting agency and the source data agency? 3141 (b)(2)(A)(i)(IV-V)
- 3) In relation to data validation, how do the new measures (indicators) affect data validation? Particularly when the data being linked originates from other agencies like Education and Vocational Rehabilitation, will the originating agency validate the data or will the reporting agency be responsible? 3141 (b)(5)
- 4) Since Rehabilitation title I is included in all primary indicators for reporting purposes, what flexibility does the workforce agency have to ensure data exchanges are encompassing all participants for the measures? And, if measure(s) are not met, are the sanctions applied to both the reporting agency and the source data agency? 3141 (b)(2)(A)(i)
- 5) Additional definition of data to be included on the ETA 9171 (Eligible Training Provider report) is being requested. Is Commerce expected to use the definitions as our report specifications currently in use? 3141 (b)(4)

### **Kansas Board of Regents Comments:**

The Kansas Board of Regents would like to respectfully submit the following comments in response to WIOA Common Performance Reporting Information Collection Activities (Docket ID: ETA-2017-0001, Federal Register Number: 2017-01069):

- 1) The requirement to collect data on individuals who are not WIOA participants puts a burden not only on the eligible training provider (ETP), but also on the agency tasked with collecting the data. Many ETPs are not currently reporting to a state agency, and as such would need to negotiate data sharing agreements, as well as develop systems by which this data may be reported to the state agency tasked with its collection. Additionally, we have concerns that many ETPs do not have access to labor data requiring them to use "self-reported", and therefore less reliable, wage data than would be available using data match. As others have mentioned, we believe that the workload required to report data would serve as a deterrent to many potential ETPs.
- 2) While we find many of the non-WIOA and All Student data elements challenging, we submit that the program specific data as exemplified by elements 129 and 130 are particularly burdensome. For example, many ETPs already report a general tuition and fee schedule. However, program specific book, tool and fee costs vary from program to program and can change multiple times per year. The sheer volume of

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data can present collection issues, but we are unclear how ETPs should report if costs have varied over the course of a year.

### **Kansas Department for Children and Families Comments:**

No comments at this time.

### **Kansas Department of Labor Comments:**

No comments at this time.