

## Nebraska Department of Labor – Office of Employment and Training

Workforce Innovation and Opportunity Act (WIOA) Common Performance Reporting

OMB Control Number 1205-0526

ETA 9171 – ETP Definitions Responses

- **Exiters** Data Elements (106, 108, 110, 113, 114, 115, 137, 138) in ETA-9171 – how is the "withdrew" portion of this data element defined? Is this the first class frequency period (week, month, quarter, semester, year, etc.) that the enrollee is no longer enrolled or does this classification require a formal declaration and supporting documentation as a transfer or completion would? How, specifically, should community colleges – who have frequent departure and return of students in any given program – be asked to track and report this date when providing data on students for eventual reporting? Will the point of withdrawal be different by institution type?
- **Completers: Median Earnings** Data Elements (115, 120) in ETA-9171 – are WRIS out of state numbers to be included in these calculations? Counts of identifiers for completers are fine for employment rate calculations to simply add to the total, but when looking into median wages this would currently require manual insertion of wage amounts into median calculations to find the correct amount depending on the correct interpretation of WRIS regulations.
  - Current interpretation of WRIS regulations prohibits the storage or usage of WRIS wage data from other states alongside in-state data to build a "national database." Manual inclusion of WRIS wage data would put an undue burden on the agency in order to complete accurate, verifiable calculations for eligibility determinations and reporting.
  - In addition to other issues, the naming of data element 115's Data Element Name is not descriptive of what the element itself is looking for. Element 120 specifies "in the second quarter after exit," but 115's description name omits this.
- **Obtained a Credential** Data Elements in ETA-9171 –
  - **Obtained a Credential** (116, 117) data elements versus **Credential Rate** (121, 122) data elements. Is there a reason for the deviation from naming convention between these three sets of data elements? The definition fields seem to match.
  - What is the target population for WIOA/non-WIOA/All Individuals groups who completed a secondary school diploma or equivalent in the obtained credential/completer data elements? Does the all students completers and exiters customer group include completers and exiters who receive this credential if they do not receive it on the way to getting another credential?
  - Are the individuals attending programs with the ultimate goal of receiving only a secondary school diploma or equivalent still to be counted in denominator values along with those who are planning to go on to post-secondary/career specific training that had the HSD/Equivalent prerequisite?
- **Reporting period** (ETP) – the reporting period is presumably a default for wages and employment % to be a quarter period as there is a relative date difference of 2 and 4 quarters from a completion period and thus looking at a period greater than a quarter would add complexity the relative time calculation, expanding it to account for different quarters within the reporting period.
  - What dictates the first required reporting period for an ETP program? Program application date? Program approval date?
  - If the reporting period is or becomes (as in the case of yearly reporting as a combination of the quarters that make up that period) greater than one quarter and looking at

quarters relative to that timeframe, are the periods examined treated as one reporting period with the end of that 6 month or 1 year etc. period dictating which quarters are used as the 2 and 4 quarter from exit/completion or are the relative quarters utilized to check for employment and wages to be relative to each specific quarter that makes up the reporting period?

- **Reporting Burden** – The extracts required for eligible institutions to apply for initial eligibility as well as maintain their eligibility through subsequent reviews and additional consumer and federal reporting will place burdens on institutions additional to their other federal reporting requirements.
- **Undeclared/dual credit/piecemeal course students at Community College institutions** – How should dual credit high school students taking college credit courses be counted in the total counts and (denominator) data elements? Fields involving **Total** and **Exiter** component – including employment and wage elements – (105, 106, 113, 114, 115, 137, 138) could be interpreted to include undeclared, dual credit, or piecemeal course students, namely at community colleges, due to the phrasing in element 105: "any individual who was enrolled in *a course that is part of a program of study* within a quarter." These courses may be *part of* multiple programs, but the student not directly associated with one until the point that they declare their major's program. At what point are these students to be included in data provided by institutions, and thus affect performance calculations?