

March 19, 2021

Dear Clearance Officer,

This letter is in response to the 30-day Paperwork Reduction Act notice published in the Federal Register on February 17, 2021 (**FR document number 2021-03115, OMB control number 1205-0526**) for the U.S. Employment and Training Administration's family of Workforce Innovation and Opportunity Act-related forms used to collect data published in the Participant Individual Record Layout (PIRL), namely Forms **ETA-9169, 9170, and 9171**.

I am writing to share the perspective of users of PIRL data for academic research. While there is not a large community of scholarly researchers using PIRL microdata at this time (besides myself, I am aware only of scholars based at Brookings and the Upjohn Institute), those of us who are exploring this unique dataset appreciate its potential for helping us to answer critical questions about nature of work, training and unemployment in the United States. Two of my research projects illustrate the versatility and value of PIRL microdata. I first used PIRL data in a collaborative project with Workcred (an affiliate of the American National Standards Institute) funded by the American Association of Retired Persons – Public Policy Institute. This project, recently presented by my colleague Isabel Cardenas-Navia at the “Uneven Outcomes in the Labor Market” virtual conference hosted by the Federal Reserve Bank of Atlanta, identified substantial variation in labor market outcomes between younger and older workers who obtain WIOA Individual Training Accounts (ITAs). In 2020, I was the principal investigator on a research grant funded by the Department of Health and Human Services, Assistant Secretary for Policy and Evaluation (ASPE) through the University of Wisconsin Institute for Research on Poverty's Extramural Grants Program. In this project, which I described on a panel webinar in January 2021 hosted by HHS/ASPE and attended by stakeholders from multiple federal stakeholder agencies, I found that there is a clear relationship between the duration of a non-degree credential funded by a WIOA ITA and labor market outcomes after program completion.

In the below recommendations, I focus on three shortcomings of the PIRL that I believe limit its value for academic researchers and may explain to some degree why so few researchers are currently working with PIRL microdata. These issues are the timeframe covered by the PIRL microdata with respect to pre- and post-program participation labor market characteristics, inconsistent data quality, and delays in data availability.

First, I want to draw attention to the fact that PIRL microdata collected via Forms 9169, 9170, and 9171 does not cover labor market outcomes more than four quarters pre- and post-program participation. While knowing earnings a year post completion is better than no data, understanding the long-term outcomes associated with training will require long-term data collection. In this regard, I endorse the recommendations of the Better Employment and Training Strategies (BETS) taskforce concerning public workforce system data. In particular, the BETS taskforce recommends **expanding data on post-program completion labor market outcomes from four quarters to a period of 2-5 years after completion**. Collecting such longitudinal data would significantly improve the utility of the PIRL dataset created using data from the ETA-9169, 9170, and 9171 forms to researchers.

Data quality is another issue with the PIRL microdata that could be addressed by improving the collection of data through Forms 9169, 9170, and 9171. Researchers have noticed suspicious state-to-state variations in how credentials and training is reported, with some states (e.g., New Mexico) reporting implausibly high values for the proportion of program participants receiving training – which I speculate may be a result of missing data. Occupational and field of study coding is another area where data quality is suspect; for example, implausibly high numbers of WIOA program participants report being trained in the O\*Net code for “top executives” considering the socioeconomically disadvantaged nature of most program participants. I suggest that OMB, as a term of clearance, require the ETA to thoroughly explore potential strategies for improving the quality of the PIRL dataset. **ETA should assemble a research team to evaluate the quality of the data provided by states, identify patterns of missing data, and develop a plan for filling in missing data.** While ETA may be able to do some of this work in-house, if needed ETA should be prepared to engage with an academic or other research organization to systematically review the entire PIRL public use files and identify shortcomings in the data. Members of the Non-Degree Credentials Research Network (NCRN), an academic research network administered by the GW Institute of Public Policy consisting of over 80 experts on training, credentials, and workforce development, would welcome the opportunity to consult with ETA on developing a strategy for improving the quality of data contained in the PIRL.

In addition to quality issues, the utility of PIRL microdata released to the research community is hampered by **substantial delays in the availability of microdata**. While ETA does a reasonable job of publishing descriptive summaries of quarterly workforce system results, as of writing this (3/19/21), the most recent PIRL microdata available for download dates back to the third quarter of 2018. In the wake of the COVID-19 pandemic, urgent action is needed on the part of policymakers to identify promising strategies for re-employing disadvantaged workers; decisions about, for example, which fields of study are deserving of investment in the creation of new training programs will be most accurate if made with up-to-date data. Therefore, OMB should require that ETA develop a plan for reducing the time lag between the collection of data and the publication of microdata.

Additionally, I request that OMB also require ETA to take steps to **improve the accessibility of PIRL data to the research community**. An easy first step in this regard would be for ETA to break the PIRL down into discrete files for each individual state to allow researchers focusing on local labor market conditions to avoid the computational demands associated with the massive national data file. ETA should also distribute PIRL in file formats compatible with commonly used statistical packages such as Stata, SAS and SPSS.

In summary, OMB could directly adopt the following term of clearance when approving the ETA-9169, 9170, and 9171:

*OMB directs ETA to consult with data users (including researchers outside the public sector) and assess issues with the timeframe of pre- and post-completion labor market outcomes data, the overall quality of data (including patterns of missing data), the lag time between data collection and dataset publication, and the accessibility of microdata. ETA should report back to OMB in nine months with findings and the steps that ETA will take to address these issues.*

Thank you for the opportunity to provide input on this important data source. Please feel free to contact me with any questions about the above feedback.

Best Regards,



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