



STATE OF WASHINGTON  
EMPLOYMENT SECURITY DEPARTMENT  
*PO Box 9046 • Olympia WA 98507-9046*

November 27, 2023

Kellen Grode  
U.S. Department of Labor  
Employment and Training Administration  
Office of Policy Development and Research  
200 Constitution Ave. NW, Room N-5641  
Washington, DC 20210

Re: Agency Information Collection Activities; Comment Request; Department of Labor-  
Only Performance Accountability (OMB #1205-0521)

Dear Kellen Grode:

The Washington State Employment Security Department (ESD), in its capacity as the state workforce agency, requests the U.S. Department of Labor (DOL) add two new PIRL data elements to the data outlined in the PIRL Reporting Specifications.

States must annually provide data to DOL to determine their significant migrant and seasonal farmworker (MSFW) offices, which include the percentage of MSFW participants who prefer Spanish. We would like to streamline that reporting process by incorporating improvements to the PIRL, which we feel will also add value to the PIRL.

### **Background**

Each year we send two DOL MSFW Significant Agricultural Offices reports to our management staff to analyze: one for our WorkSource Management Information System (WSMIS) data and one for the PIRL. We do this because the definition of "Prefer Spanish" is derived differently for our WSMIS and the PIRL. We only send the PIRL data to DOL but analyze both data sets. We recommend streamlining the process by adding two new PIRL data elements:

- Do you need translation assistance? (Yes, No)
- Language preference (Selection of a language)

### **Challenge**

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1. The PIRL data does not provide a direct and definitive way to identify participants who prefer Spanish (or any other language). To determine prefer Spanish, DOL directed us in 2021 to do the following:
  - a) Use PIRL Data Element 803 English Language Learner at Program Entry (WIOA), PIRL Data Element 805 Cultural Barriers at Program Entry (WIOA), and PIRL Data Element 403 Ethnicity: Hispanic / Latino (WIOA) as a proxy for prefer Spanish when preparing DOL reports that are required to report prefer Spanish.
  - b) Within this construct, the job seeker may or may not prefer Spanish. It is not definitive. It also says that the job seeker may need translation assistance, which is not definitive with respect to whether the job seeker needs translation services.
2. In our current MIS, we collect the following data elements to identify job seekers who prefer a specific language and whether they need translation assistance:
  - Do you need translation assistance? (Yes, No)
  - Primary Language (Selection of a language). Note: We are discussing whether to change this to Language Preference in our new WSMIS.

This is a more definitive and efficient way to decipher if job seekers prefer Spanish (or any other language) and adds the ability to definitively assess whether the job seeker needs translation assistance.

3. 1 and 2 above are two entirely different constructs for deciphering whether job seekers prefer Spanish (or any other language).
  - a) We acknowledge the DOL MSFW Significant Agricultural Offices report only asks for the percentage of MSFW participants who prefer Spanish. If the PIRL also identified whether they need translation assistance, it would fix a barrier and add value.
  - b) Under the current situation, we prepare two MSFW Significant Agricultural Offices reports to our MSFW program/management staff to give them the ability to analyze the data in both reporting constructs (1 and 2 above). Suggestion no. 2 above is a more definitive, efficient, and cleaner way of deciphering whether a job seeker prefers Spanish (or any other language).

## **Proposal**

1. We request DOL add two new PIRL data elements to the PIRL Reporting Specifications:
  - a) Language Preference (Selection of a language) (Required for Wagner-Peyser) (The PIRL would be fed with the Primary Language field currently collected in our WSMIS)
  - b) Do you need translation assistance? (Yes, No) (Required for at least Wagner-Peyser) (The PIRL would be fed with the Do you need translation assistance? field currently collected in our WSMIS)

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- PIRL Data Element 2214 (pictured below) is in the PIRL Reporting Specifications but is only required for the National Farmworker Jobs Program (NFJP). We do not report for NFJP, plus the data element speaks to receiving not needing translation services. This concerns the Wagner-Peyser (WP) cohort and specifically the WP MSFWs. Not the NFJP.

DATA ELEMENT NO.	DATA ELEMENT NAME	DATA TYPE/ FIELD LENGTH	DATA ELEMENT DEFINITIONS/INSTRUCTIONS	CODE VALUE	Reportable Individual?	Wagner-Peyser	WIOA Adults	WIOA Dislocated Workers	WIOA Youth	Dislocated Worker Grants (DWG)	TAA	National Farmworker Jobs Program (NFJP)
2214	Related assistance: Translation and Interpretation Services	IN 1	Record 1 if the participant received related assistance services which involves a bi-lingual agent who hears or reads the language of one party and speaks or writes another language for another party. One of the two parties will be a program participant. Record 0 if the participant did not receive any translation and interpretation services.	1 = Yes 0 = No								2

## Summary

Collecting the two suggested PIRL Data Elements would be valuable because they would support a clean and efficient way to definitively determine the percentage of MSFW participants who prefer Spanish on the DOL MSFW Significant Agricultural Offices report. They would also help determine if job seekers need translation assistance, which would add value for our job seekers if identified on the PIRL.

Thank you for considering our proposal.

Please contact Sam Havens at [samuel.havens@esd.wa.gov](mailto:samuel.havens@esd.wa.gov) if you have questions or need further clarification.

Sincerely,

DocuSigned by:

*Gustavo Avilés*

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Gustavo Avilés

Chief Analytics Officer

cc: Tracy Hall, Deputy Director, DATA division, Employment Security Department  
Dan Zeitlin, Chief of Staff, Executive Programs, Employment Security Department  
Sam Havens, Reporting, Accessibility, and Performance Manager, Employment Security Department  
Dave Wallace, Research Director, Washington Workforce Training & Education Coordinating Board  
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