



To: U.S. Department of Labor
From: Workforce Data Quality Campaign
Re: Post Enrollment Data Collection of Job Corps Participants, Docket ETA-2016-0001
Date: May 2, 2016

Workforce Data Quality Campaign (WDQC) is a non-profit initiative that promotes inclusive, aligned and market-relevant education and workforce data. Guided by a diverse group of national partners and state officials representing stakeholders across the education/workforce spectrum, WDQC encourages the use of data to ensure that all of our nation's education and training programs are preparing students and workers to succeed in a changing economy.

The following are WDQC's comments in response to the Post Enrollment Data Collection of Job Corps Participants (Docket ETA-2016-0001). We appreciate the opportunity to offer recommendations to the U.S. Department of Labor (DOL) on this issue.

WDQC is concerned that as Job Corps transitions into meeting the reporting requirements for the Workforce Innovation and Opportunity Act (WIOA), DOL plans to continue relying entirely on surveys for performance reporting. The supporting statement for this Information Collection says:

"No other existing source of data can meet the specific data reporting requirements of WIOA. Although Sections 159 and 116 of WIOA note that the Secretary of Labor may collect information on former Job Corps students by using quarterly wage records, such records do not include information sufficient to support reporting on all the different indicators. For example, the records do not include information about wage rates, hours worked, and jobs that are not covered by unemployment insurance (UI). In addition, UI wage records do not provide any information about enrollment in school or training programs, which is a key program outcome. All of the information referred to in this collection is required to fully measure participant performance under the WIOA performance measures, as required by Section 159 of WIOA. The instruments presented in this application have been designed to collect this information."

We believe that DOL is missing an opportunity to fully utilize administrative data, and adhere to the spirit of WIOA, by using surveys to collect all of the required performance information. There are two sources of administrative data that could assist with performance reporting: Unemployment Insurance (UI) wage records and state longitudinal data systems.

Although regulations and guidance on performance reporting are not yet final, it is our understanding that WIOA core programs intend to use UI wage records as the primary source to report on the employment-related indicators detailed in Section 116. Job Corps is not a core program, but it is responsible for reporting on the core indicators, and Sec. 159 states: "The Secretary shall collect the information described in subsections (c) and (d), using methods described in section 116(i)(2) and consistent with State law, by entering into agreements with the States to access such data for Job Corps enrollees, former enrollees, and graduates." Sec. 166(i)(2) specifically directs that wage records be used as a primary source of information for performance reporting. Most DOL-funded training and employment programs have been using UI wage records for performance reporting for years. Although

wage records are an imperfect source of data, state systems and the Wage Record Interchange System (WRIS) have proven adequate as the basis for reporting.

Given that the language in WIOA says Job Corps shall use wage records for reporting, and that multiple programs have used this data and demonstrated its utility for performance reporting, WDQC recommends that DOL reconsider using wage records for reporting on employment-related core indicators.

In addition, WDQC believes there is a missed opportunity to promote Job Corps participation in state longitudinal data systems to assist with reporting on enrollment in postsecondary education and credential attainment. Currently, many state systems have serious gaps in their systems (e.g. lack of information from for-profit career schools) that would make reporting on postsecondary enrollment challenging, but over time, we expect that state systems will continue to improve and become a viable source of this information. WDQC recommends that DOL consider how state longitudinal data systems could be utilized to augment, and perhaps eventually replace, surveys as a way to report on credential attainment.

WDQC acknowledges that surveys will remain a critical tool for reporting on Job Corps outcomes, especially for the program-specific indicators mandated by Section 159(d). However, some reliance on UI wage records and other administrative data for the core indicators could allow shorter surveys, which would reduce burden on respondents and could potentially result in higher response rates and lowered costs. Reducing the number of survey questions about employment and income could be particularly helpful in generating better response rates, as recent research suggests people are especially reluctant to answer survey questions about income.¹

In summary, WDQC urges DOL to examine opportunities to utilize administrative data in conjunction with surveys as it continues to implement WIOA performance requirements. Thank you for the opportunity to comment.

¹ Bruce D. Meyer and Nikolas Mittag. "Using Linked Survey and Administrative Data to Better Measure Income: Implications for Poverty, Program Effectiveness and Holes in the Safety Net," NBER Working Paper No. 21676, October 2015.