

Docket ID Number ETA-2016-0002

Comments of National Job Corps Association

On

“Comment Request for Information Collection for Post Enrollment Data Collection of Job Corps Participants, Revision With Changes”

On behalf of the National Job Corps Association (NJCA) Board of Directors, and the 50,000 youth served by our members each year by 15,000 dedicated staffers, we are submitting comments regarding the Department’s plans to use post-center surveys to collect data on Job Corps graduates and former enrollees outcomes. The proposal to continue relying on surveys through the Post Enrollment Data Collection System (PEDCS) is unnecessary, overly burdensome to youth and employers, and inefficient in light of the Department’s statutory obligations under the Workforce Innovation and Opportunity Act (WIOA).

WIOA’s Requirement to Use UI Data Makes PEDCS Unnecessary

Sec. 159(e) of WIOA requires that:

(e) METHODS.—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.

The referenced ‘methods’ are the quarterly wage records collected through the state unemployment insurance system:

116(i)(2) WAGE RECORDS.—In measuring the progress of the State on State and local performance accountability measures, a State shall utilize quarterly wage records, consistent with State law. The Secretary of Labor shall make arrangements, consistent with State law, to ensure that the wage records of any State are available to any other State to the extent that such wage records are required by the State in carrying out the State plan of the State or completing the annual report described in subsection (d).

The Department’s compliance with this requirement will make any further collection of wage and employment data for students through PEDCS largely redundant and unnecessary. Utilizing unemployment insurance (UI) wage data, for example, through the Wage Record Interchange System (WRIS), will in almost every case be more accurate, less burdensome, and less costly than the current PEDCS approach, particularly with respect to the primary indicators of performance specified in section 116(b)(2)(A)(ii).

However, UI data does not include all people in the labor force, omitting some in agricultural employment, military and federal civilian employment, railroad employment and self-employment. Some states link their UI wage databases to other databases such as the U.S. Department of Defense (DoD), U.S. Office of Personnel Management (OPM), U.S. Postal Service to resolve this issue. DOL should be able to do the same at a national level.

Even so, gaps will remain with respect:

- Employment unreported in UI data;
- Lack of detailed occupational data limiting ability to report job training matches - Sec. 159(d)(1)(H);
- Lack of data on hourly wages on start and at 6 months - Sec. 159(d)(1)(K).

These gaps can be most easily and cost-effectively addressed through:

1. commonly available databases such as theworknumber.com, studentclearinghouse.org, and www.dmdc.osd.mil/appj/scra/scraHome.do;
2. reporting and career transition services (CTS) professionals who are already in communication with students and their employers.

Data integrity and validity should be ensured through comparisons with available UI data (wages earned and NAICS codes) as well as periodic audits. Altogether this approach should prove less costly, less burdensome for youth and employers, and more accurate than PEDCS.

WIOA Program Alignment and Performance Comparison

A core principle of WIOA is to align the performance reporting of the various programs authorized under the law using the primary indicators of performance defined in Sec. 116. In order to comply with the intention of the law, Job Corps must use not only the same performance measures but also the same methods for capturing this data as the other programs authorized by the law. Congress specified as much in Sec. 159(e).

Sec. 116 of WIOA requires all authorized programs to collect data on job placements, enrollment in postsecondary and apprenticeship programs, and the satisfaction of employers. Job Corps should utilize the same methods for data collection that are being proposed for other WIOA programs administered by the Employment and Training Administration (ETA).

In addition, to meet the spirit of the law, Job Corps should utilize the same definitions as other WIOA programs administered by ETA to the extent practicable. Specifically, Job Corps must utilize the same definition of ‘exit from the program’ for the purpose of the primary indicators of performance. If ETA continues to define exit as not having received services in a 90 day period, this may mean students receiving that mandated nine months of CTS services are not yet exiters. Job Corps could also continue to collect data on its current post-graduation measures for internal management purposes.

Transition

While the NJCA believes Job Corps should transition away from PEDCS to meet the requirements of WIOA, we support the continued use PEDCS as a supplement while Job Corps transitions to its new practice. This will help Job Corps identify gaps in data collection and serve as bridge until Job Corps is able to set appropriate benchmarks under the new performance measures.