

Comments to ICR – State of California Employment Development Department, Workforce Services Branch (CA EDD WSB)

ETA-2017-0002-0001: Federal Register

1. “Under WIOA section 116(d)(6), the Secretary of Labor is required to annually make available (including by electronic means), in an easily understandable format, (a) the State Annual Performance Reports containing the information described in WIOA section 116 (d)(2) and (b) a summary of the reports, and the reports required under WIOA section 116 (d)(6) (the State Performance, Local Area, and **Eligible Training Provider Reports**), to the Committee on Education and the Workforce of the House of Representatives and the Committee on Health, Education, Labor, and Pensions of the Senate.”
 - a. The Departments have not provided the necessary information for States to complete the Eligible Training Provider Report for Program Year 2016. It is an unrealistic expectation for States to have to complete this report for PY 2016-17 with no report specifications, finalized definitions, or the cohorts identified for this report. This report requires data on individuals not served through the WIOA program, so it is unrealistic to expect that States can create an MIS system, and gather the data needed to produce the report within such a short timeframe. Since an annual report is not considered complete unless the ETP report is submitted and made publicly available, and not submitting the ETP report is considered a sanctionable offense, CA EDD WSB strongly encourages the Departments to provide States with a waiver for the ETP reporting requirements for the PY 2016-17 annual report.
2. “An individual should be considered to have exited after they have gone 90 days without service, and with no future services scheduled. **Should they return for additional services after the 90 days—within the same program year and exit in that same program year—the individual’s exit date will be changed to reflect only the last exit date in that program year.** If the individual exits in a subsequent program year, they would be counted as a new participant for purposes of that subsequent program year.”
 - a. This type of reporting will place a burden on the States to update and change existing MIS systems and current reporting practices. The Wagner-Peyser program often has participants return within the same program year, so this type of calculation will place a burden on the staff managing the program’s performance. In addition, this type of policy and the impact on performance may be punitive to States that have implemented a common exit policy. To promote coenrollment across WIOA programs, and to reduce reporting and performance confusion, it is recommended that definition of exiter and period of participation as outlined in TEGL 10-16 is maintained.

ETA-2017-0002-0002: Supporting Statement

1. “The Labor Exchange Reporting System (LERS), authorized under OMB Control Number 1205-0240, is the only current mechanism for collecting performance information on the Wagner-Peyser Act Employment Service and Jobs for Veterans’ State grants’ activities. As such, this set of reports is necessary for tracking and reporting, to stakeholders, information on the usage, services provided, and performance of these programs. More specifically, these reports are used to monitor the core purpose of the program – mainly, tracking how many people found jobs; did people stay employed; and what were their earnings. It is expected that OMB Control Number 1205-0240 will be utilized for all Program Year 2016 reporting; this ICR will be discontinued after all required reporting is completed. Due to lag times in performance outcomes, this will likely be after the close of Program Year 2017” (Page 12).

- a. Please provide clarification. Does this mean that States are required to conduct dual reporting for the Wagner-Peyser program by submitting both the LERS and the PIRL? CA EDD WSB recommends that only the PIRL be used for PY 2016-17 as dual reporting places a burden on both the MIS system, as well as the States.
2. "It should be noted that for the following programs - National Farmworker Jobs Program (NFJP); National Dislocated Worker Grants; YouthBuild; H-1B grant programs; Senior Community Service Employment Program (SCSEP); Re-entry Employment Opportunities (REO) grants; and Section 166: Indian and Native American programs - in lieu of a non-SSN unique identifier grantees will collect and provide to ETA SSNs which will allow ETA to match wage records for grantees and lessen the burden on grantees to track post-program outcomes" (Page 22-23).
 - a. If the States are already capturing SSN and conducting base wage matching for some of these programs, is it required for the SSN to still be submitted to DOL ETA? CA EDD WSB recommends clarifying the language to indicate that the SSN is only required to be sent to DOL ETA if the State is unable to conduct base wage matching for the program.
3. Table 1: Quarterly (Program) Performance Report (ETA-9173) Annualized Burden Hour Estimate
 - a. Why is JVSG not included as a program? CA EDD recommends including JVSG as a separate program as they have their own column with specific required data element in the ETA PIRL.
 - b. Recommend increasing the burden per response for the Adult, Dislocated Worker, and Youth program from 4 to 12 as there are three programs within this grouping.
4. Table 2: Quarterly (Program) Performance Report (ETA-9173) Annualized Burden Cost Estimate
 - a. Why is JVSG not included as a program? CA EDD recommends including JVSG as a separate program as they have their own column with specific required data element in the ETA PIRL.
5. Table 5: Participant Annualized Third-Party Disclosure Burden Hour Estimate
 - a. Why is JVSG not included as a program? CA EDD recommends including JVSG as a separate program as they have their own column with specific required data element in the ETA PIRL.
 - b. Recommend increasing the burden per response for the Adult, Dislocated Worker, and Youth program from .25 to 0.75 as there are three programs within this grouping.
6. Table 6: Recordkeeping WIOA Participant Individual Record Layout (PIRL) (Hours)(ETA-9172)
 - a. Why is JVSG not included as a program? CA EDD recommends including JVSG as a separate program as they have their own column with specific required data element in the ETA PIRL.
 - b. Recommend increasing the burden per response for the Adult, Dislocated Worker, and Youth program from .25 to 0.75 as there are three programs within this grouping.

ETA-2017-0002-0003: Report Templates and Specifications

Program Performance Report Specifications

1. Field Label B.3d: Unemployed Individuals
 - a. Why is "not in labor force" included in this line item? Including "not in labor force" data in this line item skews the data, as these individuals may not be looking for employment. CA EDD WSB suggests removing "not in labor force" from this line item calculation.
2. Field Label C.8: Eligible migrant and seasonal farmworkers
 - a. Why are we utilizing the WIOA sec 167 definition for all programs? The NFJP program serves a small percentage of WIOA participants, so CA EDD WSB recommends that the calculation for this line item be changed to include PIRL data element 413 – Migrant Seasonal Farmworker Designation.
3. Field Label D.5: Measurable Skill Gains

- a. Why is Other Reason for Exit = 007 included in the Measurable Skill Gains calculation for WIOA Adult/Dislocated Worker? Per TEGL 10-16, Criminal Offender takes a WIOA Youth out of the MSG denominator. This should only be included for Title II.
- b. The specifications in each column for MSG line item are identical. Please update the specification to ensure the data matches the report headers.

Program Performance Report Specifications (Youth)

1. Field Label B.3d: Unemployed Individuals
 - a. Why is “not in labor force” included in this line item? Including “not in labor force” data in this line item skews the data, as youth may not be looking for employment. CA EDD WSB suggests removing “not in labor force” from this line item.
2. Field Label C.8: Eligible migrant and seasonal farmworkers
 - a. Why are we utilizing the WIOA sec 167 definition for all programs? The NFJP program serves a small percentage of WIOA participants, so CA EDD WSB recommends that the calculation for this line item be changed to include PIRL data element 413 – Migrant Seasonal Farmworker Designation.
3. Field Label D.5: Measurable Skill Gains
 - a. Why is Other Reason for Exit = 007 included in the Measurable Skill Gains calculation for WIOA Youth? Per TEGL 10-16, Criminal Offender takes a WIOA Youth out of the MSG denominator. This should only be included for Title II.
 - b. The specifications in each column for MSG line item are identical. Please update the specification to ensure the data matches the report headers.

ETA-2017-0002-0005: ETA 9172 – Modifications to PIRL

1. The addition of the IWT program column
 - a. Incumbent Worker Training may or may not produce a recognized credential, or a measurable skill gains. Why is this data required for an Incumbent Worker if they are not participants in the program?
 - b. TEGL 10-16 indicates that certain information is required for IWT participants including demographic information. The IWT column in the PIRL does not include an “R” for most of the demographic data elements. It appears that the IWT requirements in the PIRL may be incomplete.
 - c. The performance data elements that are required for IWT rely on an exit date for calculations, but the PIRL data element 901 – Date of Exit is not required for IWT.
2. PIRL 302 – Campaign Veteran
 - a. Why is this data element being added for the Youth program, but no other Title I programs? Per the most recent schema changes, this data element is also required for Adult and DW. To ensure consistency across documents and programs, CA EDD WSB recommends that this data element either be removed from all Title I programs, or added to all Title I programs.
3. PIRL 307 – TAP Workshop in 3 Prior Years
 - a. This was removed from the LERS, but is now being brought back. To reduce the data collection for Wagner-Peyser staff, CA EDD WSB recommends that this data element be removed.
 - b. Why is this data element being added for the Youth program, but no other Title I programs? To decrease the data collection on staff, CA EDD WSB recommends that this data element be removed as a requirement for youth.
4. PIRL 309 – Homeless Veterans’ Reintegration Program Participant
 - a. Why is this data element required for Reportable Individuals? To reduce the data collection burden on jobseekers, it is recommended that this requirement be removed for Reportable Individuals.
5. PIRL 310 – Homeless Veterans’ Reintegration Program Grantee

- a. This data element is not appropriate for Reportable Individuals. Individuals accessing the system on their own will not necessarily know their HVRP grant number. CA EDD WSB recommends removing the requirement for this data from Reportable Individuals.
6. PIRL 411 – Most Recent Date of Qualifying Separation
 - a. Why is this data required for Wagner-Peyser? Only select few Wagner-Peyser staff are trained to conduct TAA eligibility, so the majority would not know that the client has a separation from trade-impacted employment that qualified them to receive benefits and/or services under the Trade Act. To reduce incorrect data, and minimize the data collection burden for Wagner-Peyser staff, CA EDD WSB recommends that this data element is not required for Wagner-Peyser.
7. PIRL 601 – Exhausting TANF Within 2 Years
 - a. The Wagner-Peyser program is not a case management program, and thus they enroll multiple people daily. Adding this additional data element places a burden on Wagner-Peyser staff to collect additional data prior to providing the client the services they need. Additionally, Wagner-Peyser staff do not have access to TANF records, so the answer to this question may be inconsistent and inaccurate as it would rely on jobseeker self-attestation. To ensure accurate data collection, and reduce the burden on the Wagner-Peyser program, CA EDD WSB recommends that this data element be removed as a requirement for Wagner-Peyser.
8. PIRL 808 – Migrant and Seasonal Farmworker Status at National Farmworker Jobs Program Entry (WIOA sec. 167)
 - a. Why is this data element required for Title I, Title III, DWG and JVSG? These programs do not administer the NFJP program, so it is not appropriate to expect them to capture this information at NFJP program entry. Additionally, the definitions under this data element do not align with PIRL 413, so it would create confusion when trying to determine which MSFW definitions the client meets. CA EDD WSB strongly recommends that this data element be removed from Title III, Title I, DWG and JVSG.
9. PIRL 913 – Adult (WIOA)
 - a. Seeking clarification on the appropriate circumstance to record “Reportable Individual” for this data element. For States with multiple programs utilizing the same MIS system, the requirement to report a funding stream for reportable individual poses a problem as program applications/eligibility are not required to provide reportable services. Please provide clarification on when to report an Adult as reportable only.
10. PIRL 904 – Dislocated Worker (WIOA)
 - a. Seeking clarification on the appropriate circumstance to record “Reportable Individual” for this data element. For States with multiple programs utilizing the same MIS system, the requirement to report a funding stream for reportable individual poses a problem as program applications/eligibility are not required to provide reportable services. Please provide clarification on when to report a Dislocated Worker as reportable only.
11. PIRL 907 – Recipient of Incumbent Worker Training
 - a. Why is this data element required for Wagner-Peyser and JVSG? These programs do not send participants to Incumbent Worker Training, so it is not appropriate to include it for these programs. CA EDD WSB recommends that this data element be removed for Wagner-Peyser and JVSG.
12. PIRL 909 – Rapid Response (Additional Assistance)
 - a. Why is this data element required for Wagner-Peyser and JVSG? These programs do not conduct Rapid Response Additional Assistance programs, so it is not appropriate to include it for these programs. CA EDD WSB recommends that this data element be removed for Wagner-Peyser and JVSG.
13. PIRL 1101 – Most Recent Date Accessed Self-Service Workforce Information Services

- a. With the removal of “self-service” from the title and description, the data element appears to be the same at data element 1103. CA EDD WSB recommends maintain the “self-service” designation, or removing one of the data elements, as there is no need for two of the same elements.
14. PIRL 1300 – Received Training (WIOA)
 - a. This data element is now required for Wagner-Peyser and JVSG, which do not place participants into training. Please provide clarification around the reporting requirements for these programs related to this data element; i.e. is this just for coenrolled participants?
15. PIRL 1814 – Date Attained Graduate/Post Graduate Degree (WIOA)
 - a. Why has this data element been separated out from PIRL 1800, 1802 and 1804? The date was being captured in 1801, 1803 and 1805, so it seems unnecessary to create a new line item. Additionally, based on the report specifications, Title I would not receive a positive in the Credential Attainment measure if a participant is coded under 1814. CA EDD WSB recommends removing PIRL 1814 and keeping the data in 1800-1805.
16. PIRL 2003 – DWG Grant Number
 - a. The code value does not match the edit checks that were implanted for WIPS. Please correct.