

## 60 Day DOL Performance Reporting ICR Comments

FutureWork Systems LLC submits the following comments and questions regarding the U.S. Department of Labor (DOL) Performance Reporting & Information Collection Request (DOL-ICR) package published on May 23, 2017 for a 60-day comment period (OMB ICR Reference Number ETA-2017-0002-0001).

### New Reportable Individual Codes and Co-Enrollment Questions.

Code value 4 and Code 2 for WP = Reportable Individual has been added to Adult, DW, Youth, and Wagner-Peyser (Data items 303, 304, 305 and 318). These new coding requirements raise questions concerning how co-enrolled individuals should/could be counted or not counted in performance indicators. Please clarify if the following scenarios of co-enrollment are allowable and how performance and “counts” of reportable individuals should be recorded:

- Within Title I, an individual is co-enrolled in adult & dislocated program with adult coded as a 4 and dislocated coded as a 1. Do they only count in the Dislocated Performance Indicators and as Reportable Adult?
- Within Title I, an individual is co-enrolled in the adult & youth program with adult coded as a 4 and youth coded as a 1. Do they only count in the Youth Performance Indicators and as a Reportable adult?
- An individual is co-enrolled in adult Title I coded as 4 and Wagner-Peyser Title 3 coded as a 1. Do they only count in the Title III Performance Indicators and again counted as a Reportable Title I adult?

### Coding an ITA as Type of Training.

Under WIA, occupational training under an ITA (WIASRD Item 1223) was coded as “06 Other Occupational Skill Training” in the Type of Training” (WIASRD Item 1209 Type of Training).

The DOL PIRL under Column D of Type of Training 1, 2 & 3 (Item 1303, 1310 and 1315) Notes that “Code 6 (Other) should only be used in rare instances where other codes are clearly not appropriate”. If a participant received occupational training through an ITA (PIRL 1319) i.e. CDL, LPN, CNA, how should that participant be coded under Item 1303 Type of Training? Is Code 11, in fact, the code value that should rarely be used and Code 6 should be used for an ITA, or is an ITA not recorded in the Type of Training data element?

### Covered Entrants Cohort and Reporting

The PIRL Spec named **ETA-2017-0002-0003\_MEASURES\_AND\_REPORTS** was published to <https://www.regulations.gov/docket?D=ETA-2017-0002> on 5/24/2017 with 3 new indicators that we would like clarified. The indicators regarding covered entrants have their logic spelled out, however we are not clear on the cohorts. For example, the Employment Q2 measure is reported 4 quarters after exit and the Employment Q4 measure is reported 6 quarters after exit – but during which reporting period are the new covered entrant indicators reported? And to clarify, are these exiters only?