

WIOA Performance Workgroup Joint Comments

Workforce Innovation and Opportunity Act (WIOA) Common Performance Reporting
OMB Control Number 1205-0521
Requested Comments

Participant Individual Record Layout (ETA-9172), (Program) Performance Report (ETA-9173) comments:

- SCSEP is now added to the layout for reporting. Given the recent federal government budget plan, should this be placed on hold until it is known if SCSEP will be funded next year? It takes significant time to create the related data extracts and field order. If states must now change the order only to later remove several columns because of budget constraints, this situation will create an unnecessary burden on states.
- Reportable Individual: The new layout requires states to indicate, by title, who is reportable and who is not. Based on services received, programming could be utilized to determine just those who are reportable. All participants were reportable individuals, but all reportable individuals are not participants. Under the new layout, a reportable individual is now required to list by program format, however each program is required to indicate if reportable for that program. The reportable individuals can be calculated by service fields already reported. Is the intent to treat programs as separate entities or to increase funding linkages and co-enrollment? If an Adult and a Dislocated Worker, if Adult funds orientation and Dislocated funds all other services, the individual is listed as a participant for Adult and DW currently. In this example, based on ICR proposed reporting, would Adult be just reportable only while Dislocated Worker is a participant?
- Page 5, Average Cost Per Participant. Amount of funds spent on each type of service: The Cost Per Participant Career Service will include any participant with a career service, however, some may have also received training during this same time frame. How then would the funds be differentiated between Career and Training? How will the figures be determined?
- Under Evaluation of Program and Activities, it lists coordination and integration of services. What is expected here? Full system integration, reporting integration of all core programs, or within the centers no duplication of services? What does Full System Integration mean, how is this being defined? Full Integration in a reporting system or cross pollination of programs.
- Page 5, "Number of Participants who are enrolled in more than 1 of the programs described in WIOA sec. 116(b)(3)(A)(ii)"...Information collected on Rehabilitation, Adult Education, Youth Build, Job Corp, etc. are partners not using the same reporting system and will be staff identified, not system validated. This means the data is underreported for many states where reporting systems are not shared. How are program files combined if these programs are not sharing the same 12 digit identifier, given that it is not required based on TEGL 10-16? How are states to determine the number Co-Enrolled and Number of Participants with Barriers to Employment served by each of the core programs? TEGL 10-16, page 37 states, "Establish a unique identification number that will be retained by the same individual across multiple programs." This statement does not say required across all core programs, which we are thankful for, but then this is a reporting category that we cannot report on.

- Page 6, “General effectiveness of such programs and activities in relation to their cost, including the extent to which the programs and activities improve the employment competencies of participants in comparison to comparably-situated individuals who did not participate in such programs and activities..” How will comparably situated individuals be identified?

- Page 9 under TAA Act Program: requests a “description of efforts made to improve outcomes for workers under trade adjustment assistance program that promote efficiency and effectiveness”. How is efficiency and effectiveness being defined? Is it a qualitative or quantitative measure?

- Job for Veterans State Grant, Veterans program: field 914 now lists LVER in the report specification. Stating received services from Local Veteran Employment Representative (LVER). Under TEGL 19-13, LVERs should not be dealing directly with job seekers. Page 7 of the TEGL states “LVERS must perform only the duties outlined in 38 U.S.C. 4104 (b), which are related to outreach to employer community and facilitation within the states’ employment service delivery system. Therefore, LVERs must be assigned duties that promote to employers, employer associations, and business groups the advantage of hiring veterans.” Why would states record a LVER touching a jobseeker if their responsibility is to the businesses?

- Page 24, listed under burden, certifying 3 reports before transmission to USDOL. Under current reporting, states are certifying 7 reports each quarter, not 3.

- Page 25 has the number of hours by program to complete quarterly reporting. Each program has 4 hours listed. If states are submitting 7 program titles, then the federal government is assuming 28 hours to complete, not the 3 weeks, or 275 hours, that it actually takes to create an extract in the correct format needed to pass edit checks; the number is largely under estimated. Title IV is new to quarterly reporting and their reporting now includes open and closed cases. The estimated time to produce a reporting extract is 130 hours, however not including time to clean edit checks and federal system corrections. Maybe in Year 3, when the related policies, etc. stop changing, it will take less time to complete.

- Page 38 states, “These costs include: enhancements to data collection systems to adhere to WIOA requirements, training staff on data collection rules, and for ETA there is an associated IT cost for transitioning data intake systems to collect exit information in a new method (i.e., data systems must be able to re-open closed cases if a participant re-enters the program within a given program year)”. The definition of exit in TEGL 10-16 specifies for Title I, Title III, TAA and DWG, etc. as 90 days no services and no future services are scheduled, without looking at self or informational activities, or follow-up. This means that a person could be counted 4 times in a year as a participant. This sentence in the Supporting Statement is implying only one exit per program year which differs from current federal guidance and would require massive system changes with lack of explanation and details of how to implement such change. Reopening cases would cause large gaps in service delivery and impact reporting systems in order to allow such gaps. This will cause issues in supplying follow up if the true exit is not known until the full program year has elapsed. If a person starts services on 6/15/2016, and exits 7/1/2017, based on this “new” meaning, the 7/1/2017 exit is not real because the person may come back during the program year. If said person comes back in on 10/1/17, the exit of 7/1/17 cannot count, but since first participation covered 2 program years,

should systems record exit for each program year? What if a participant overlaps a program year, are states to report an exit for each year? This is confusing and beyond system functions. For 15+ years States have recorded the date of exit based on the last service received with no services recorded for 90 days and no services are scheduled. And with the “new” meaning, exit will not be recorded until a program year elapses, to determine when the exit occurred within a program year.

- PIRL Items 300 through 310: It appears that based upon WIPS Schema changes, by PIRL program file, published on 4/6/2017, these fields were not taken into consideration on the Federal Register ETA 9172 document. For example, PIRL items related to veterans #300 through 310 are inconsistent with attached Federal Register ETA 9172 documentation.

- PIRL 909- Why is Rapid Response Additional, required for WP and JVSG reporting? Additional is reported for WIOA Dislocated Workers.

- PIRL 1101 is currently defined as Self-Service Workforce Information, and the listed change removes the “self-service” wording. PIRL 1103 is currently defined as Staff Assisted Workforce Information – with the removal of “self-service” from 1101, the 2 fields appear to have the same definition.

- PIRL Field 1401 under the PIRL Tab Changes: field 1401 to be renamed “Enrolled in Secondary Education Program” removing “at Program Entry.” We agree with the deletion of “at Program Entry” because the definition allowed enrollment during participation. Because the new definition listed has GED and other High School equivalent indicated, the name of the field should reflect the new definition, “Enrolled in Secondary Education, GED, or High School Equivalent Program” more closely reflects the definition listed.

- PIRL Field 1814, Date Attained Graduate/ Post Graduate Degree for RSA only: Listed as required for WP, Adult, DW, DWG, TAA and Youthbuild. This is not an option under Title I or Title III, so why is this field required if it is just for RSA. WIOA regulations list allowable degrees through Baccalaureate, not post graduate for Title I. Basically, the field should not be required for the programs outside of RSA.

- PIRL Field 2700, SSN: On page 22 of supporting statement lists the programs where SSN is required. “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.” Under the data specifications, National Dislocated Worker Grant is not listed with an R for reporting, however the supporting statement has the DWG program listed in the grouping.

- Measurable Skill Gains: It is appreciated that MSG is now looking at Training/Education Completion Dates for who is included in the measure. If the most recent date of MSG is utilized/recorded, a date for one program year could overwrite a date for a prior program year. The extract would therefore not contain historical data of the first gain in the next program year reporting. The same situation applies with post test scores, because only posttest is recorded, the individual’s score gain is not shown year after year, or month after month.

- Incumbent Worker reporting: The intent was to increase the number of fields for incumbent worker reporting. Under this new ICR, demographic data fields has been removed. Was this an oversight?

The PIRL document seems incomplete: TEGL 10-16 stated that Incumbent Worker is to collect demographic data and barrier data but none of the PIRL items are listed as required for Incumbent Workers in this ICR. There are data elements related to employment after exit, but there is no requirement to report an exit date. In addition, TEGL 10-16 requires for Incumbent Workers that their exit date is not as defined for PIRL, it is the Training Contract end date. As systems need to be modified it is imperative that complete documentation is provided for planning purposes to accommodate system modifications needed. Having incomplete documentation associated to this Federal Register causes an undue burden. Incumbent workers typically are receiving training of some type, but why are PIRL items 1300 through 1318 not required for training, especially if Credentials and Measureable Skills gains are reportable for Incumbent Workers? Was this an oversight?