

July 24, 2017

Montana formally submits comments to the Employment and Training Administration's Information Collection Request ETA-2017-0002, WIOA DOL-Only Performance Accountability, Information, and Reporting.

The Primary Document, "Agency Information Collection Activities; Comment Request; Workforce Innovation and Opportunity Act", states the following:

Under this collection, participation will be measured based on the count of individuals who meet the definition of a "participant"—*e.g.*, those who have received staff-level services within the program year. 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. Counting unique individuals in this manner will allow an unduplicated count of participants in the accountability and reporting system. The Department understands that this may affect quarterly reporting results and counts of services rendered early in the program year, particularly for programs whose current reporting practices differ from what is described above. As such, we greatly encourage your comments on the potential impact on individual states and local areas of this and all other items discussed in this package.

In response to changing the exit date of a subsequent period of participation when you have two or more participation periods in a program year, Montana's comments are:

Their stated reason for making this change is: "Counting unique individuals in this manner will allow an unduplicated count of participants in the accountability and reporting system."

If this is DOL's goal, they can already achieve this with the current PIRL. We are already required to report element #100 Unique Individual Identifier. DOL has already stated in the description of this field that this will be used to get a count of unique participants for a program year.

Under the new guidance, we would effectively be submitting less information. If DOL really wanted to, they could combine the participation periods on their end. If we combine them on the State's end, they lose information. Anyone with multiple exits now looks like one continuous participation period. If later, you want to analyze gaps between participation periods, you no longer have reliable data. We also report the values of some of the fields held at program entry. These fields can change so if we combine participation periods, we must choose to report the earlier or later values (most likely earlier). This means we would have no knowledge of changes in risk factors and may draw incorrect conclusions.

We do not have enough guidance to make this change. This requirement is essentially asking states to retroactively change data. This brings up numerous questions for how we should report data and how

we should resolve conflicts. For example, someone exits during Q1. In Q2 we report post exit data. In Q3 they receive new services creating a new participation period, and they do not exit. For Q3 we should now report two rows, the original one with an exit date and the new one with no exit date. In Q4 they exit again. Are we expected to report 1 row for Q1, Q2, and Q4, but 2 rows for Q3? What do we do about the post exit data from Q2 in Q3 and Q4?

The performance measure for Measurable Skill Gain would have a negative affect for States if this change is made. Currently, states are able to count one gain per year per period of participation. If the participation periods were combined for a Program Year, states would miss any MSG that happened during a 2nd or 3rd period of participation in the year.

Comments from MT on changes to PIRL data elements:

#808: Migrant and Seasonal Farmworker Status at National Farmworker Jobs Program Entry

We do not understand why this change is taking place. We are reporting all the information necessary to convert the old values to the new ones.

#903: Adult (WIOA)

The change to add 4. Reportable Individual is confusing. The first confusing part is how to determine if someone has demonstrated an intent to use Adult services when they are only receiving self-service or informational services only. The second confusing part of this change is if we are able to determine if a Reportable Individual has demonstrated an intent to receive Adult services, why is there not an "R" in the Reportable Individual column?

#904: Dislocated Worker (WIOA)

Same comment as #903.

The change to add 4. Reportable Individual is confusing. The first confusing part is how to determine if someone has demonstrated an intent to use Dislocated Worker services when they are only receiving self-service or informational services only. The second confusing part of this change is if we are able to determine if a Reportable Individual has demonstrated an intent to receive Dislocated Worker services, why is there not an "R" in the Reportable Individual column?

#905, 918

They have added an additional value for Reportable Individual to these columns. That does not make sense since this is not a required field for reportable individuals. When would we ever report this value?

#918: Wagner-Peyser Employment Service (WIOA)

Demonstrating an intent to use Wagner-Peyser services is a bit easier than determining if someone has demonstrated an intent to use Adult or Dislocated Worker services, however there is still the question of why is this not reportable for a Reportable Individual (an "R" in the Reportable Individual column)?

#1101: Most Recent Date accessed Workforce Information Services

Because the words "self-service" were removed from the description, does this mean that we are only supposed to report staff assisted workforce information services? Or, any Workforce Information services provided by self-service or staff assisted?

#1211: Transitional Jobs

Approve the removal of this PIRL element.

#1800: Type of Recognized Credential (WIOA)

Graduate/Post Graduate degree was removed from one of the types of credentials to report, however, in the data element definitions/descriptions, there is still a reference to "master's degree". Maybe this was just an oversight?

#1813: Date Completed Training

This is odd because it explicitly states that it includes education that began before program enrollment. So it looks like we are expected to record completion dates for education we had nothing to do with. If true, this likely requires an entirely new field as training completion is currently tied to services provided.

#1814: Date Attained Graduate/Post Graduate Degree

This was explicitly removed from the type of recognized credentials so not sure why we are reporting this on the PIRL (for DOL programs).

#2800 – 2847 SCSEP Fields:

This is a big problem for Montana. In addition to these 48 fields a bunch of existing columns are required for SCSEP. This includes columns in odd places like Youthbuild and Reentry Employment Opportunities (formally Reintegration of Ex Offenders). Currently in Montana, SCSEP is run by a private organization. We believe they currently only report to us a limited set of aggregated data. We have had data integrity issues with the little they do report. To correctly report SCSEP data we would have to at a minimum match clients across systems, get Experience Works to collect this information, create a way for them to transfer that data, and update our MIS system to store the data.

The cost to the State of Montana to make these changes to reporting is estimated at **\$100,488**.