NH PACIA Comments for WIOA-PIRL ICR, June 12, 2017.

Item 1. The proposed changes include making PIRL data element 413 - Migrant and Seasonal Farmworker Designation (Wagner-Peyser) a required field for WIOA Adults, WIOA Dislocated Workers and WIOA Youth. The name of PIRL data element number 413 - would also be changed from Seasonal Farmworker Designation (Wagner-Peyser) to Migrant and Seasonal Farmworker Designation.

PIRL data element 413 - Migrant and Seasonal Farmworker Designation (Wagner-Peyser) was included in the specification for calculating ETA-9173 WIOA Quarterly Report measure C.8 - Eligible migrant and seasonal farmworkers for WIOA Adults, Dislocated Workers and Youth. The proposed ETA-9173 WIOA Quarterly Report measure C.8 - Eligible migrant and seasonal farmworkers specification, however, excluded PIRL element # 413 Migrant and Seasonal Farmworker Designation.

If PIRL data element 413 - Migrant and Seasonal Farmworker Designation is not to be used for calculating measure C.8 - Eligible migrant and seasonal farmworkers for WIOA Adults, Dislocated Workers and Youth anymore, then what is the purpose of requiring PIRL data element 413 to be populated for WIOA Adults, WIOA Dislocated Workers and WIOA Youth? On the other hand, if PIRL data element 413 - Migrant and Seasonal Farmworker Designation was intended to be a required field for WIOA Adults, Dislocated Worker and Youth, then why is it not to be used for calculating measure C.8 - Eligible migrant and seasonal farmworkers for WIOA Adults, Dislocated Workers and Youth anymore?

Item 2. When calculating all Basic Career Services and Total Career Service measures on ETA-9173 WIOA Quarterly Report, the previous specifications had included PIRL data element # 1000 Date of First Basic Career Service (Self-Service), and the proposed changes use data element #1002 Most Recent Date Received Basic Career Services (Self-Service) instead.

This change doesn't seem necessary. The current specification for measures in the ETA-9173 WIOA Quarterly Report only verified that PIRL data element # 1000 – Date of First Basic Career Service (Self-Service) is not null. Likewise, the proposed specification for measures in the ETA-9173 WIOA Quarterly Report only verified that PIRL data element # 1002 – Most recent Date Received Basic Career Services (Self-Service) is not null. When a date is required to be populated in these fields, both PIRL data elements # 1000 and # 1002 will contain a date value within any particular record. In other words, the specification only verifies that the PIRL data element, referenced above, is not null. Both data elements will contain a value, and the exact date—whether the measure uses the first or most recent date—is not relevant to this calculation. Therefore, this change does not affect the outcome of the calculation. What was the purpose of this proposed change?

Item 3a. Why does the "Reportable Individual" (column F) column exclude the letter "R" (indicating a required field) for proposed PIRL data elements 903, 904, 905 and 918, while including "Reportable Individual" (as shown below) in their corresponding CODE VALUE, ?

PIRL data element 903 - Adult (WIOA) / CODE VALUE "4 – Reportable Individual"

PIRL data element 904 – Dislocated Worker (WIOA) / CODE VALUE "4 – Reportable Individual"

PIRL data element 905 – Youth (WIOA) / CODE VALUE "4–Youth Reportable Individual"

PIRL data element 918 – Wagner-Peyser Employment Service (WIOA) / CODE VALUE "2 – Reportable Individual"

Item 3b. Why does the "Reportable Individual" (column F) column exclude the letter "R" (indicating a required field) for proposed PIRL data elements 900 - Date of Program Entry (WIOA) and 901 - Date of Program Exit (WIOA)?

Both of the data elements 900 and 901, referenced above are required to calculate performance measure A.3 Total Reportable Individuals on ETA-9173 WIOA Quarterly Report.

Item 4. The ETA-9173 WIOA Quarterly Report performance measure specifications contain errors, as follows:

D.4 Credential Rate – The greater than or equal to (i.e. **>=0)** clause in the numerator is incorrect. The numerator criteria includes: "Employed 1st Quarter after exit **>=**0 and <9, or Employed 2nd Quarter after exit **>=**0 and <9, or Employed 3rd Quarter after exit **>=**0 and <9, or Employed 4th Quarter after exit **>=**0 and <9". For the PIRL data elements corresponding to above specifications, the correct values are greater than zero (>0) and not greater than or equal to (>=0). In these data elements, '0' is code for Not Employed, and is not to be included in the Credential Rate numerator.

D.5 Measurable Skill Gains – The specification for calculating all Measurable Skill Gain metrics (Individualized Career Services, Training Services, and Total Current Period) are EXACTLY the same. Their criteria cannot be the same because they reflect different cohorts and are therefore incorrect. The correct specification would require the criteria for Individualized Career Services to be different from that of Training Services. Alternatively, if the specifications are not changed, the Individualized Career Services and Training Services measures could be removed, and Measurable Skill Gains would only be calculated for the Total Current Period.