

DOL Information Collection Request ETA-2017-0002-0001
May 23, 2017

State of South Carolina, Department of Employment and Workforce

The ICR proposes to change the exit methodology as follows:

“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 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.

We disagree with this proposed exit methodology.

- An ever-moving exit target significantly complicates evaluation of primary indicators for individual programs.
- The exit cohort is especially critical regarding the credential attainment measure. Unlike other measures that rely primarily on wage record matching, this measure requires staff follow-up to validate and document credentials, as well as enrollment in education or training, within one year after exit.
- It would create an erroneous continuous participation period.
- Participant characteristics captured at the first participation may differ from those captured at the second program entry, and thus impact the statistical adjustment model for individual measures.

We continue to question the excessive data collection for Wagner-Peyser (WP), which is a universal access program. Examples include multiple questions regarding disability (data elements 203-209) and individual characteristics such as homeless or runaway youth (#800), low income status (#802), English language learner (#803), basic skills deficient (#804), cultural barriers (#805), single parent (#806), displaced homemaker (#807), etc.

- How is WP expected to collect this data when staff-assisted services can be provided virtually?
- How would WP staff be expected to know what makes someone low income or basic skills deficient, as these characteristics are applicable to Title I programs?
- Is this data collected from self-attestation or is documentation required for WP?
- Will any of this data be included in WP data validation?
- If the questions can all be answered “No” by participants and/or staff, then how accurate is the data?

WP funding does not support the additional workload for staff to collect all of this data. Unnecessary data collection takes time away from serving customers. If an individual just wants assistance in finding a job and/or being referred to a job, this invasive data collection will not be warmly received. Our labor exchange system should be customer friendly and efficient. It should not be viewed as bureaucratic and burdensome.