

July 24, 2017

Office of Policy Development and Research, Room N5641
Employment and Training Administration
U.S. Department of Labor
200 Constitution Avenue NW
Washington, DC 20210

Submitted Via Portal

RE: Workforce Innovation and Opportunity Act (WIOA) DOL-Only Performance
Accountability, Information and Reporting System (PIRL)
Docket ID #: ETA-2017-0002

Dear Sir/Madam:

Thank you for the opportunity to comment on the Workforce Innovation and Opportunity Act (WIOA) DOL-Only Performance Accountability, Information, and Reporting System. We have reviewed the information provided by USDOL and offer the following comments.

1) The Program Performance Report Template proposed would be an inadequate replacement of the currently used Senior Community Service Employment Program (SCSEP)'s Quarterly Progress Report (QPR), which is the key management report used by SCSEP grantees. Some observations about this revision:

- The Program Performance Report does not reflect key pieces of data that measure the community service impact of the SCSEP. For instance, the number of hours worked in service to the general community, to the elderly community, etc., are absent from this report. By ceasing to report this information, the document ignores a significant aspect of SCSEP's multiple missions which include: 1) fostering self-sufficiency through unsubsidized employment; and providing part-time community service work-based training which enhances the services community service public and non-profit agencies are able to provide locally.
- The proposed report template also omits certain information that has practical utility to SCSEP program management including:
 - Several barriers such as: Residence in a Rural Area, Age 75+, At Risk of Homeless, Frailty, Severely Limited Employment Prospects, etc. (yet these are required data points in the PIRL report)
 - Total hours paid (also a required data point in the PIRL report)
 - Average project duration
 - Employment data such as average wage, benefits, etc.

Additionally, the new format does not allow for the comparison of goals against current actual performance, which is one of the most useful functions of the report and one that should not be eliminated.

Lastly, the list of performance measures is incomplete on this report. The "Effectiveness in serving Employers" measure and the "Community Service Hours" measure are omitted, although they appear in the 2016 OAA Reauthorization.

2) Other comments and questions:

- SCSEP's unique design provides skills growth opportunities to participants through work-based training assignments. For this reason, the new performance indicator, Credential Rate, has limited relevance to SCSEP and is not one of the SCSEP performance measures in the Older Americans Act Reauthorization of 2016. As well, because this measure tracks credentials obtained up to 1 year after exit, this will add an additional burden to our performance of routine follow-up, which is already one of the most difficult elements of administering the SCSEP.
- Clarification is needed on what information flows into this report. Does this report draw only from data reported by the entity running the report? Or, does it draw from data collectively reported by WIOA partners? For instance, if a participant is dual-enrolled with SCSEP and Vocational Rehabilitation (VR), and VR inputs into the system that a participant has earned a credential, is that credential then reflected on a report run by SCSEP? How is credit for the credential distributed among the different programs? Which partner enters which information?
- In the Program Performance Report, what does "Program to Date" refer to? Is this equivalent to "program year to date", or a longer period?
- According to TEGL 26-16, the performance measure on Employment is based on the second and fourth quarters after exit, while the Earnings measure is based on the second quarter after exit. Why then are we asked to report employment in the first quarter after exit? (#1600 in the PIRL, page 54)
- We are concerned about the data elements that SCSEP is required to report, but that do not apply to SCSEP (for instance, the elements in PIRL section E.02 regarding H1B training and underemployment).

Thank you. Sincerely,



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