

State of Washington, Employment Security Division

RE: Agency Information Collection Activities; Comment Request; Workforce Innovation and Opportunity Act (WIOA) DOL-only Performance Accountability, Information, and Reporting System

Docket ID: ETA-2017-0002

Agency: Employment and Training Administration (ETA)

Parent Agency: Department of Labor (DOL)

Primary Document: Agency Information Collection Activities; Comment Request; Workforce Innovation and Opportunity Act (WIOA) DOL-only Performance Accountability, Information, and Reporting System
ID: ETA-2017-0002-0001

1. "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."

We understand from the comments submitted by Texas, tracking number 1k1-8xl7-945f, that this change is actually not being proposed. We hope this is accurate, however, if it is part of the proposal we see this change as a significant burden on States. The complexities of this method of reporting would require significant modification to MIS reporting systems, and require extensive instruction to States on the business rules for collapsing multiple participation episode into one under certain circumstances and not under others. The effort to understand, implement, test and provide this method of reporting would place a significant burden on each state. Additionally, it seems that DOL will have all the necessary information to collapse multiple exits during a program year into one from the PIRL provided by each state. Doing so at the federal level would be less error-prone and more cost-effective than requiring each state to perform this task.

ID: ETA-2017-0002-0002: Supporting Statement

2. "The Labor Exchange Reporting System (LERS), authorized under OMB Control Number 1205-0240, is the only current mechanism for collecting performance information on the Wagner-Peyser Act Employment Service and Jobs for Veterans' State grants' activities. As such, this set of reports is necessary for tracking and reporting, to stakeholders, information on the usage, services provided, and performance of these programs. More specifically, these reports are used to monitor the core purpose of the program – mainly, tracking how many people found jobs; did people stay employed; and what were their earnings. It is expected that OMB Control Number 1205-0240 will be utilized for all Program Year 2016 reporting; this ICR will be discontinued after all required reporting is completed. Due to lag times in performance outcomes, this will likely be after the close of Program Year 2017" (Page 12).

We are requesting clarification on this item. Does this mean States are to submit a LERS and a PIRL for PY16 and PY17? We have transitioned to reporting Wagner-Peyser and Jobs for Veterans' State grants on the PIRL only and to revert to the LERS would place a substantial burden on the State.

ID: ETA-2017-0002-0005: Modifications to PIRL

1. PIRL 302 – Campaign Veteran
 - a. The change for this element is to make this a requirement for Wagner-Peyser and WIOA Youth. Currently this element is only required for Trade and JVSG. We do not see this as a productive use of staff resources as very few youth participants fall into this category.
2. PIRL 307 – TAP Workshop in Prior 3 Years
 - a. This proposal makes this new element a requirement for WIOA Youth. We do not see this as a productive use of staff resources as very few youth participants fall into this category.
3. PIRL 310 – Homeless Veterans' Reintegration Program Grantee
 - a. This element is required for Reportable Individuals, Wagner-Peyser, JVSG, WIOA Adult, DW and WIOA Youth. However, the related PIRL elements 311 through 314 are only required for Wagner-Peyser and JVSG. It seems reasonable to collect this data for Reportable Individuals, Wagner-Peyser and Jobs for Veterans Grant but not for Title 1 programs.
4. PIRL 401 – UC Eligible Status
 - a. The State would appreciate clarification as to the impact of the removal of the word “monetarily”. The State would also appreciate clarification as to why Code 5 has changed to “Exempt” from “Claimant exempt from work search”. Clarification may require the State to change its MIS system.
5. PIRL 411 – Most Recent Date of Qualifying Separation
 - a. The State would appreciate clarification as to why this element would be required by Wagner-Peyser. This element is currently captured by Trade Act staff. The definition of this element falls under the Trade Act program and thus should not be required for Wagner-Peyser.
6. PIRL 413 – Migrant and Seasonal Farmworker Designation
 - a. The State appreciates the change for this element as it will simplify data capture which will lead to more accurate data.
7. PIRL 603 – Supplemental Nutrition Program (SNAP)
 - a. Does making this a required element mean the State is required to collect this information from everyone who receives a participant-level service? If so, the State sees this as a data collection burden.
8. PIRL 704 - Foster Care Youth Status
 - a. Does making this a required element mean the State is required to collect this information from everyone who receives a participant-level service? If so, the State sees this as a data collection burden.

9. PIRL 801 - Ex-Offender Status at Program Entry
 - a. Does making this a required element mean the State is required to collect this information from everyone who receives a participant-level service? If so, the State sees this as a data collection burden.
10. PIRL 808 - Migrant and Seasonal Farmworker Status at National Farmworker Jobs Program Entry
 - a. The State would appreciate clarification as to why this element is required for Title 1 and Title 3 programs. The State sees this as a data collection burden for Title 1 and Title 3 programs.
11. PIRL 903 - Adult (WIOA), 904 – Dislocated Worker (WIOA), 905 – Youth (WIOA), 918 – Wagner-Peyser Employment Service (WIOA) – Value 4 – Reportable Individual
 - a. How is a state to determine whether a person “has demonstrated an intent to use program services”? Does this mean a person has demonstrated an intent to use Youth services versus demonstrated an intent to use Adult or Dislocated Worker services? We are not seeing how a state can determine a reportable individual’s intent.
 - b. If the state determines a person meets one of the criteria for A or B, how is a state to determine which data element - 903, 904, 905 or 918 should be populated?
12. PIRL 1300 - Received Training (WIOA)
 - a. Wagner-Peyser staff cannot provide training, so the State does not see the requirement for Wagner-Peyser to populate this element as appropriate.
13. PIRL 1504 – Subsistence While in Training
 - a. It appears this element has been removed, yet the R remains for TAA. Was this a typo error, or is the element required by TAA?
14. PIRL 1800 – Type of Recognized Credential (WIOA) and 1814 – Date Attained Graduate/Post Graduate Degree (WIOA)
 - a. The element number has a “)” at the end of it – which is presumed to be a typo
 - b. By the removal of code 4 – Graduate/Post Graduate, for participants who received such a certificate are States to use code 7 – Other Recognized Diploma, Degree or Certificate? And when using a code 7, is the State expected to populate 1801 – Date Attained Recognized Credential (WIOA)?
 - c. As other states have mentioned other code values have been renumbered. Furthermore, the data removed is now being captured in a new field, element 1814 – Date Attained Graduate/Post Graduate Degree (WIOA). Both these changes will a burden to the state to change its MIS system.
15. PIRL - 1814 – Date Attained Graduate/Post Graduate Degree (WIOA)
 - a. Please clarify why this field is required for Wagner-Peyser. This field is for participants who received their degree after receiving education or training services. Wagner-Peyser does not provide participants education or training services.
16. PIRL – 1900 – Youth 2nd Quarter Placement (Title 1) (WIOA) and 1901 – Youth 4th Quarter Placement (Title 1) (WIOA)
 - a. Why were the Unsubsidized Employment, Registered Apprenticeship and Military removed for these two elements?

