




Document Details

Docket ID:	ETA-2017-0002
Docket Title:	Agency Information Collection Activities; Comment Request; Workforce Innovation and Opportunity Act (WIOA) DOL-only Performance Accountability, Information, and Reporting System
Document File:	
Docket Phase:	Notice
Phase Sequence:	1
Original Document ID:	ETA-2017-0002-DRAFT-0021
Current Document ID:	ETA-2017-0002-0018
Title:	Utah Department of Workforce Services - Carver, Elizabeth
Number of Attachments:	0
Document Type:	PUBLIC SUBMISSIONS
Document Subtype:	
Comment on Document ID:	ETA-2017-0002-0001
Comment on Document Title:	Agency Information Collection Activities; Comment Request; Workforce Innovation and Opportunity Act (WIOA) DOL-only Performance Accountability, Information, and Reporting System
Status:	Posted
Received Date:	07/19/2017
Date Posted:	07/20/2017
Posting Restriction:	No restrictions
Submission Type:	Web
Number of Submissions:	1

Document Optional Details

Status Set Date:	07/20/2017
Current Assignee:	NA
Status Set By:	Quilloin, Herman (ETA)
Comment Start Date:	05/23/2017
Comment Due Date:	07/24/2017
Post Mark Date:	

Tracking Number: 1k1-8xlr-pqfi 

Page Count: 1 

**Total Page Count
Including Attachments:** 1

Submitter Info

Comment:

General Comments Overall the reporting requirements on the PIRL are invasive and burdensome for states. The reporting requirements are not sustainable if WIOA continues to suffer severe program funding cuts. The amended DOL ONLY PIRL has 2,847 elements. This is an inordinate amount of data that is being required from each state and many of those receiving services are receiving career services. Each state invests significant efforts to capture and report all of this data each quarter. Reducing the reporting burden and focusing on outcomes would allow states to refocus funding they are currently spending on reporting requirements for innovative efforts that benefit the workforce. Many of these reporting requirements should be scrutinized to determine the value they add to the development of the U.S. workforce. ETA-9172- DOL PIRL Amended Document Element 307 requires us to report if a veteran or Transitioning Service Member attended a TAP workshop in a 3 year period prior to the date of participation. Why does this element single out WIOA Youth but exclude Adult, DW, and Trade? It seems like there aren't many youth who would fit into this category if any at all. We understand this is an appropriate element for Jobs for Veterans State Grant and Wagner Peyser but we do not understand why WIOA Youth were added. The data element definition for element 411 and 412 specify Trade Act. If the definition specifies Trade impacted customers only why is it required for Wagner Peyser? Utah believes these elements are more appropriate for Trade customers only. Utah believes the changes made to element 413 are very positive. The change of only requiring states to report if the customer is seasonal OR migrant allows for more accurate and straightforward data. Element 704 added a requirement to capture Foster Care Youth status for Wagner Peyser customers. This increases the burden of reporting for customers receiving limited staff assisted services. How is foster care information beneficial for Wagner Peyser customers seeking assistance finding employment? There is also no age limit for this question so, a customer may have aged out of foster care 20 or 30 years ago and we are still asking them for this information. We recommend removing this requirement for Wagner Peyser and for Adult and DW customers over 25. Element 808 adds additional burden of separating out customers by age. Since age is already a required element why add an additional burden on this element? The data element name states Migrant and Seasonal Farmworker Status at National Farmworker Jobs Program Entry. The data element name is inconsistent with the added requirement to report this for Wagner Peyser, Adult, DW, Youth, and DWG. Utah recommends this element be applied only to NFJP and to remove the age breakout. The Graduate/post graduate was removed from the code values for elements 1800, 1802, and 1804 but it is still referred to in the data element definitions. Utah recommends counting graduate/post graduate level certificates as

credential attainment. Element 1900, 1901. The code values for youth placement 2nd quarter and 4th quarter removed unsubsidized employment, registered apprenticeship and military. These code values capture program exit reason and meet the indicators of performance requirements. Why are these exit reasons excluded from this data element? Element 805. Can you provide additional clarification or examples of cultural barriers? Element 1301, 1304, 1305. For WIOA Youth, why would it not be required to report the Eligible Training Provider Name? Out of School Youth are required to use an Eligible Training Provider and so it would be appropriate to report by provider. *🌐

First Name: Elizabeth *🌐

Middle Name:

Last Name: Carver *🌐

Mailing Address:

Mailing Address 2:

City: 🌐

Country: 🌐

State or Province: 🌐

ZIP/Postal Code:

Email Address:

Phone Number:

Organization Name: Utah Department of Workforce Services *🌐

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