

July 24, 2017

The Wisconsin Bureau of Workforce Training (BWT) and its WIOA partners appreciate the opportunity to comment on the WIOA DOL-only Performance Accountability, Information and Reporting System. We recognize and are thankful for the tremendous amount of effort put into development of the report templates and the WIOA performance accountability system by our federal partners at the Departments of Labor. We respectfully make these comments with the intention of assisting our federal partners in constructing the strongest performance accountability system possible that provides our stakeholders with great value and maximum clarity to those who must implement the system. The Bureau is submitting comments on the on behalf of the state's program and technical staff.

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### ETA 9172 DOL-only Participant Individual Record Layout (PIRL)

Please explain the federal purpose for requiring the collection of Data Elements 204, 205, 206, 207, 208, 209. We are unaware of the utility of collecting this information for federal performance calculations nor how collection can provide value to participants through the career planning/case management process. Guidance on why those elements are collected will assist states in their efforts to collect this data by minimizing the participant's likely resistance to disclosing this information.

Data Element 907: Which value should States report when an individual who received incumbent worker services via Rapid Response Activities?

Data Element 923: Is "Criminal Offender" a valid entry for WIOA Title I participants who were concurrently enrolled in the AEFLA program? The Joint Performance Accountability Guidance does not indicate this is an option for Title I programs. We are seeing a rise in the demand for WIOA Title I and III services in correctional institutions to meet Wisconsin's projected worker shortages. Is the federal government's intent for Title I to use the "Institutionalized" Other Reason for Exit, consequentially excluding from measurable skill gains during the exit program year when services are completed and the participant is not yet released from the institution?

Data Element 1800: Although Title I programs do not focus on the attainment of a Graduate Degree, these programs may support participants through dual enrollment that are attending graduate programs funded by other sources such as the Title IV Vocational Rehabilitation program. We believe collection of this type of degree for performance accountability purposes is appropriate and should be reported in Data Elements 1800, 1802 and 1804.

Data Element 1905: The specification Data Type/Data Length is listed as an IN1. There are reportable options that are two digit numbers. Please change this to IN2.

## ETA-9173 Performance Report for Adult/Dislocated Worker/Wagner Peyser programs. Youth Performance Report

The Adult and Dislocated Worker Program Credential Attainment Rate calculation includes in its denominator participants that have "Participated in Postsecondary Education During Program Participation" or were "Enrolled in Secondary Education Program". The Joint Performance Accountability Guidance suggests enrollment in non-WIOA funded education is not included in the calculation of the Credential Attainment Rate's denominator for the Adult and Dislocated Worker Program.

- "All Adult program participants who received training that was not OJT or Customized Training are included in the credential attainment indicator."
- "All Dislocated Worker program participants who received training that was not OJT or Customized Training are included in the credential attainment indicator."

We believe the report template reflects the Youth Program's Credential Attainment Rate calculation that includes all In-School Youth in the indicator's denominator. Should an Adult or Dislocated Worker participant who was in secondary or postsecondary education not funded by these programs at program entry be included in the Credential Attainment Rate?