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Comment: To Whom It May Concern: Good afternoon. I am with the Louisiana Workforce Commission. My supervisor and I have identified several elements on the proposed PIRL for comment, attached in the Word document. Thank you for your time and consideration.

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PIRL Items 108 A, B, and C--ETA assigned WIB code: Is this intended to be a three different PIRL fields or one PIRL field? How will WIB-level performance be calculated between multiple WIB codes?

PIRL 401—UC Eligible Status: why is the phrase, “from work search,” removed from the Code Value 5 description (“Claimant is exempt”)?

PIRL 805—Cultural Barriers: Can we get further guidance and possibly some examples of what, specifically, the phrase, “cultural barriers,” means?

PIRL 808--MSFW at NFJP entry: For the instructions to record code value “2” (“Participant . . . is a seasonal farmworker”), is the definition of “seasonal farmworker” for this element supposed to be as described in the instructions for recording code value “1” for this element? Or is the definition of “seasonal farmworker” the same as the definition offered in PIRL Item 413? In PIRL 413, the instructions to Record 2 specifically cited how to define a seasonal farmworker; that wasn’t the case for PIRL 808. It could help reduce potential uncertainty in the meaning of the term.

PIRL Items 903, 904, and 905—Reportable individuals for Adult/Dislocated Worker/Youth: Perhaps the instructions could be a bit more unambiguous. I am assuming that the difference between entering Code Value “4” (Reportable Individual) for PIRL 903 and entering Code Value “4” for PIRL 904 or PIRL 905 is the demonstration of intent to use Adult, Dislocated Worker, or Youth services. Why would this element be required for a non-Adult/non-Dislocated Worker/non-Youth in the respective Adult, Dislocated Worker or Youth fields?

This comment may appear confusing and rambling and, if so, I apologize. It is because I am confused, or not entirely clear, on the purpose, scope, and application of the proposed changes on these elements. Any clarification that could be offered.

PIRL 914—Veterans Programs (IN 2 data type/field length): why has the field length value been changed to “2” when all of the code values are one integer in length? Will we be required to use a leading zero or would the system still accept a single integer?

PIRL 923—Other reasons for exit: Data Element 6 definition should read, “[W]ho was determined,” instead of “determine” with no “d”.

PIRL 1100, 1101—Most Recent Date Accessed ~~Self-Service~~ Information Only/Workforce Information Services: The words “self-service” are stricken from the data element and definition. Why? How is it possible for an individual to access either of these services without the services being self-service activities? Is this because the focus is on the degree of service rather than who actually provided the service? Please advise if possible.

PIRL 1211—Transitional Jobs: Are we proposing to get rid of the “Transitional Jobs” field altogether?

PIRL 1324, 1325, 1326, 1524, 1529, 1530, 1532, 1536, 1538, and 1542—TAA expenditures: The Data Type was changed from 7.2 to 9.2. Should the “Code Value” show nine zeros instead of seven?

PIRL 1800, 1802, 1804—Type of recognized credential: Why are we replacing Code Value 4 with “Occupational Licensure” (formerly “Graduate/Post Graduate”). Should a post-graduate degree be recorded as Code Value 7 (Other)?

Should there be some detail on when to record 4 (Licensure), 5 (Certificate), or 6 (Certification), considering the close similarities of the terms? Would it be more practical to group these as one code value?

PIRL 1801, 1803, and 1805—Date Attained Recognized Credential: The font is all red for these fields, but I did not observe any changes from the current PIRL. Should there be no changes?

PIRL 1811 and 1813—Date enrolled during program participation in a program . . . leading to postsecondary credential or employment: Should the data element name read, “Leading to a Recognized Secondary or Postsecondary credential . . .”? A secondary education program (as indicated in the instructions) does not lead to postsecondary credential *per se*. The Data element Name and Data Element Definition may be confusing to some readers.

PIRL 1900, 1901—Youth placement 2nd quarter/4th quarter after exit: Are we no longer tracking employment, Registered Apprenticeship, or military placement of Youth? Would we be capturing this information elsewhere?

PIRL 2101—Underemployed Worker—Are Dislocated Workers no longer included for this data element? What about Adults and Youths? Was Dislocated Worker stricken to eliminate the focus on any other specific customer group?

Miscellaneous Data Elements: Will the SCSEP elements be at the end, and to the right, of the Miscellaneous (and all other elements) on the PIRL? If so, it is a break with precedent in which the Miscellaneous Elements signaled the horizontal end of the PIRL data. Visibly, having the Miscellaneous data elements at the far right of the data helps easily, and visually confirm the correct number of columns of data after editing a data file. Louisiana, for example, is not a state that would have any SCSEP data in the DOL-only PIRL and there for would have several blank columns to the right of the populated data, making confirmation of the correct number of columns in a file (an edit check that would cause rejection of the entire file if failed) less simple.