

# CLASP

CENTER FOR LAW AND SOCIAL POLICY

September 16, 2004

Ms. Esther Johnson  
Performance and Results Office  
Employment and Training Administration  
U.S. Department of Labor  
200 Constitution Avenue, N.W.  
Room S-5206  
Washington, DC 20210

Dear Ms. Johnson,

Thank you for the opportunity to submit comments on the proposed new method of data collection under the Employment and Training Administration (ETA) Management Information and Longitudinal Evaluation (EMILE) reporting system. The Center for Law and Social Policy (CLASP) is a national non-profit that conducts research, legal and policy analysis, technical assistance and advocacy on a range of issues affecting low-income families. Since 1998, CLASP has closely followed research and data relating to implementation of the Workforce Investment Act (WIA) and has worked closely with state and local workforce administrators on the implementation of WIA.

In general, CLASP supports the new proposal and believes that the implementation of the EMILE system will both provide richer data about program participation across 12 employment and training programs and will enable policymakers, program administrators, and advocates to gain a broader understanding of workforce development outcomes as a whole. We are, however concerned that not enough attention has been given to defining the various data elements properly which could potentially decrease the overall utility of the data. Additionally, we recognize that change to this system is not without great financial cost, and we are concerned that the proposal does not provide any new funding to develop and implement the new reporting system.

## Improved Participant Data

- The EMILE system as proposed will significantly enhance our knowledge of who is being served in the workforce development system and how individual populations are performing under the various programs. This information is crucial for identifying whether or not state and local programs are responding to the needs of their specific communities and can be useful for reshaping a program to address those needs. In addition, and perhaps most importantly, having more specific knowledge about those individuals being served can serve as a powerful

tool for state and local administrators in negotiating realistic outcomes that accurately reflect local conditions and populations being served. Specifically, EMILE improves on current data collection for the WIA program (currently collected through Workforce Investment Act Standardized Record Data, referred to as WIASRD ), in the following areas:

- *Captures Use of Core Services:* Under the current WIA data collection system, information is only collected for participants who receive either the intensive or training levels of service. However, anecdotally, we know that a large number of individuals take advantage of self-help services and staff-assisted core services that are made available to the public at large within the one-stop system. Having both a count and demographic information about those who use these services is beneficial for gaining a more complete picture of how people are accessing workforce development services.
- *Public Assistance Receipt:* While public assistance receipt is currently included in the WIASRD, the EMILE proposal includes much more detailed information on an individual's participation in specific assistance programs. Capturing this information is useful for discerning recognized barriers to employment and can be used for tailoring programs to meet the specific needs of this population. In addition, it can be used to facilitate discussions and policies that increase coordination across program lines.
- *Criminal Records:* People with criminal records often have difficulty re-entering society after incarceration, as many lack work experience upon release and face discrimination in the labor market. Currently, information on whether a participant is an ex-offender is only collected for those being served through the WIA youth funding stream, but EMILE would collect this information for adults as well.

### Standardization and Coordinated Timeframes

Another positive feature of the EMILE proposal is that it will establish a standardized set of data elements, definitions, and specifications that will be used for all of the 12 workforce development programs run by ETA. With current variations in definitions for many of these programs, case workers and service providers need to be fully versed and familiar with the variations in definitions. This can often be confusing and can lead to improper reporting. Having a unified set of definitions both eases the burden on these workers and increases the reliability of the data.

Similarly, many of these programs have different reporting timeframes. For instance, some require calendar year reporting, others follow the fiscal year, and WIA issues its reports based on its program year, which runs from July through June. These differences make it difficult to compare program performance. The ability of EMILE to produce

reports on a rolling four-quarter basis will eliminate this issue and will allow for a more coordinated picture of program-specific performance.

### Concerns around Data Definitions and Implementation

Given the short timeframe for comments on the proposed EMILE system, it seems likely that many comments will focus on the system as a whole, and very few interested parties will have had the time necessary to focus on the definitions for specific data elements. These definitions are crucial to ensure that the data being collected are that which are going to be most useful for providing information about the various programs. We encourage you to allow additional time to receive comments on data elements and definitions. For example, the definition for the proposed TANF data element instructs that a person should be coded positively for TANF receipt if he/she, at the time of participation in the program, “is listed on the welfare grant or has received cash assistance or other support services from the TANF agency.” However, this would seemingly lead to answering “yes” if the individual had *ever* received TANF or if the individual had only received TANF-funded supportive services, such as child care. We would recommend modifying this definition so that it only asked whether the individual was currently receiving TANF-funded cash assistance.

Additionally, while we believe that implementation of the EMILE reporting system will ultimately be positive, we are concerned that the proposal does not include any additional funding for states to develop the infrastructure and staff capability to implement these changes. The development of any reporting system can be quite costly, particularly one that is as complex and detailed as EMILE. States are already facing significant budget constraints, and we are concerned that without additional resources, the implementation and maintenance costs of the EMILE system will result in reduced access to workforce services. We therefore urge that DOL seek additional earmarked funding, which should not be at the expense of existing programs or services, for the transition costs states will face in the implementation of the EMILE system.

Thank you again for the opportunity to comment on this proposal. If you would like more information or would like to discuss these comments further, I can be reached at (202) 906-8023 or [afrank@clasp.org](mailto:afrank@clasp.org).

Sincerely,

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Center for Law and Social Policy