

Luke Murren
Office of Policy Development and Research, Room N5641
Employment and Training Administration
U.S. Department of Labor
200 Constitution Avenue, N.W.
Washington, DC 20210

October 2, 2015

RE: Docket ID: ETA-2015-0008; Information Collection for the Workforce Performance Accountability, Information, and Reporting System (OMB Control No. 1205-3NEW), new collection.

Dear Mr. Murren:

Thank you for the opportunity to provide comments regarding the “Information Collection for the Workforce Performance Accountability, Information, and Reporting System (OMB Control No. 1205-3NEW), new collection.” We understand that this data collection is for U.S. Department of Labor (DOL) programs only, and that the Department of Education (ED) can be expected to release their own information collection request at a later date.

The Center for Law and Social Policy (CLASP) advocates for public policies that reduce poverty, improve the lives of poor people, and create ladders to economic security. We are knowledgeable on performance measurement and data systems across workforce development, adult education, and postsecondary education, and have closely followed and commented on issues regarding performance under the Workforce Innovation and Opportunity Act (WIOA). With regard to the ETA Participant Integrated Record Layout (PIRL), CLASP would like to comment on two items: Public Assistance Information and Type of Credential.

1. Public Assistance Information

First, we are very pleased to see Section A.06—Public Assistance Information, because we noted in our [previous comments](#) on the joint ED/DOL PIRL that these data elements were missing (Docket ID: ETA-2015-0007, comments submitted 9/18/15). However, not having seen a proposed PIRL from ED, we are concerned that this information may not be collected for programs outside of DOL. We again strongly recommend that the departments add Public Assistance Information to the final joint PIRL.

With regard to the individual data elements, we suggest, as we did in our joint PIRL comments, that the Department take this unique WIOA-provided opportunity to create a new and separate data element for “Supplemental Nutrition Assistance Program,” disaggregating it from current data element 603: “Other Public Assistance Recipient.” This would allow programs, policymakers, and evaluators to see how specific public assistance programs (TANF, SSI, SNAP, and other) individually interact with WIOA programs. It would also allow us to track

how many individuals in each program are receiving training services, which is important as our organization and other interested stakeholders monitor how the WIOA Priority of Service provision is implemented across the country.

2. Type of Credential

Second, as we recommended in our comments on the joint ED/DOL PIRL, the data element “Type of Credential” (Data Element No. 1800) should be revised to include a separate code for occupational skills certifications. Note that certification (issued by industry, awarded based on an exam) is a concept distinct from a certificate (issued by an education provider, recognizes completion of a program of study.)

In addition, the Departments should provide guidance on what constitutes an “other recognized diploma, degree, or certificate.” Under WIA, but before TGEL 15-10, there was originally not enough guidance about what counted as a credential, and so a large portion of participants were reported as receiving a credential. Once the target for the performance measure was set at a high level, nearly anything was counted as a credential. As a result, the measure ultimately became one with very little meaning and was not included in WIA common measures. The category “other recognized diploma, degree, or certificate” is even broader than “credential,” and therefore, without strong guidance about what can and cannot be included, the WIOA credential attainment measure could suffer the same fate as the WIA measure.

Please do not hesitate to contact me with any question at acielinski@clasp.org.

Sincerely,

Anna Cielinski
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