

May 24, 2016

Office of Information and Regulatory Affairs  
Attn: OMB Desk Officer for DOL-ETA  
Office of Management and Budget  
Room 10235  
725 17th Street NW  
Washington, DC 20503

Submitted via email to [OIRA\\_submission@omb.eop.gov](mailto:OIRA_submission@omb.eop.gov)

**RE: ETA Workforce Innovation and Opportunity Act Performance Accountability, Information, and Reporting System (OMB ICR Reference Number: 201604-1205-003)**

Thank you for the opportunity to comment on the ETA Workforce Innovation and Opportunity Act Performance Accountability, Information, and Reporting System (OMB ICR Reference Number: 201604-1205-003). We understand that this data collection is for U.S. Department of Labor (“the Department”) programs only, and that the Department of Education (ED) may 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).

We applaud the Department for accepting CLASP’s recommendation to modify the WIOA Participant Individual Record Layout (PIRL) so that data will display whether public assistance recipients are receiving the statutory priority of service for high-need adults in Title I Adult. Under this provision, “priority shall be given to recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient,” with respect to funds allocated to a local area for adult employment and training activities.

Under the previous version of the PIRL, low-income and basic-skills deficient had their own data elements, making them trackable. However, data on “public assistance recipients” were not trackable. Public assistance in WIOA is defined as “Federal, State, or local government cash payment for which eligibility is determined by a needs or income test.” The only way to see “public assistance recipients” in the data is to combine TANF, State/local General Assistance, and refugee cash assistance. Unfortunately, “Food Stamp Assistance” was combined with general assistance and refugee cash assistance in a single data element, “Other Public Assistance.”

CLASP recommended that the Department create a separate data element for Supplemental Nutrition Assistance Program (SNAP), updating the name of the program and removing it from

forms of cash assistance. Accepting this modification will allow public assistance recipients to be trackable in the data by adding two data elements: TANF and Other Public Assistance. An additional benefit of this change is allowing programs, policy-makers, and evaluators to see how specific public assistance programs (e.g., TANF, SSI, SNAP) individually interact with WIOA programs.

CLASP praises the Department for seeing the importance of this change, even though it required the addition of a new data element. The considerable benefit of this modification outweighs the small burden of one additional data element in the collection.

Sincerely,

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Center for Law and Social Policy (CLASP)