Department of Labor Response to the Office of Management and Budget's Pass Back on the Workforce Investment Streamlined Performance Reporting (WISPR) System

OMB QUESTIONS/ISSUES		DEPARTMENT'S RESPONSES (Yellow Highlights Reflect Areas Further Clarification was Requested by OMB)	FURTHER CLARIFICATION ON CERTAIN RESPONSES PER OMB REQUEST
Broad Issues			
1/OMB General WISPR Passback #1	Please describe how ETA will alter performance reporting requirements for self-service users under WISPR to eliminate the need for states to collect SSNs from these users.	The Department held a meeting on August 24, 2007, with the Office of Management and Budget (OMB) to further discuss this issue and get a better understanding of their concerns about the collection of social security numbers (SSNs) by states for all self-service customers, because they comprise an increasingly large percentage of customers who utilize the workforce system. At the meeting the Department agreed to do some research into which states/when states are requesting SSNs, to see if it could develop some additional guidance to instruct states to only request SSNs from "serious" job seekers, rather than "casual" information browsers. The research discovered that 33 states request a SSN on their self-service sites, and 23 of these states required it for access to some self-service activities. Of these 23 states: o 16 states required it at the point that an individual wishes to apply for a job; o 2 required it to set up an account to be automatically notified of new job postings that meet the individual's criteria; and, o 1 required it to obtain staff assistance. The remaining 4 states required it earlier in the transaction, either to view jobs, or in one case, to	OMB: When will we see the revised guidance? Katherine – will we see this prior to clearing WISPR? Response: The Department is currently in the process of revising its guidance to address this issue and will share it with OMB prior to its final issuance. At this time, the Department does not anticipate having guidance to share with OMB prior to the resubmission of the WISPR Information Collection Request back to OMB for consideration. However, while related, this issue is not one that is necessarily intertwined with the WISPR proposal itself. The WISPR proposal addresses **what** should be reported for those individuals that should be reported on, while this issue addresses **who** should be included in the reporting under WISPR. Because of this, the Department believes that these two activities can occur concurrently; the Department can finish developing its guidance while OMB is performing its final review of the WISPR proposal. The Department anticipates having guidance to share with OMB by late spring/early summer.

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		access the site. Based on this research, the Department will revise its guidance to clarify that states can request a SSN, but can not deny services to individuals if they do not provide a SSN, as well as clarify the appropriate points in the self-service delivery process where the individual should be given the opportunity to provide his/her SSN, and other EEO information. This guidance will provide scenarios that indicate where an individual should be considered a self-service participant and therefore appropriately asked for a SSN. The scenario approach will allow the Department to provide guidance that accounts for the different points in time "value-added" self-services can be provided to an individual, based on differing state self-service delivery models.	
2/OMB General WISPR Passback #2	WISPR Implementation date: December 31, 2007 is unrealistic; consider March 31, 2008.	The Department understands the importance of giving states enough time to implement the changes necessary to their management information systems to effectively implement WISPR. While, the Department still thinks it is necessary to use December 31, 2007 as a pivotal date that will launch the initiative, that doesn't mean states will have to begin reporting the data at that time. The Department envisions that training for the states will begin in early 2008, there will be a transitional	OMB: Katherine – is this schedule still doable, given that WISPR has not been cleared? Response: The Department understands the importance of giving states enough time to implement the changes necessary to their management information systems to effectively implement WISPR, so the Department has revised its implementation proposal. The revised schedule takes into account that the vast majority of the

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		period in the April – June 2008 quarter where states will begin collecting the data necessary to enable them to report to the Department using the WISPR forms and formats, with the July – September 2008 quarter being the first quarter states would actually be operating under the new WISPR system. The Department would receive the first state submissions under WISPR on November 14, 2008. Under this timetable, states would have more than a year before they would have to submit reports under the WISPR system to the Department. The dates in the Handbook have been revised to reflect this timetable.	state-based programs that are part of the WISPR proposal operate on a Program Year (PY) basis (July – June), so there is a significant advantage from the state perspective in starting a new reporting system at the beginning of a PY. The Department now envisions the following implementation schedule: final OMB-approved WISPR specifications will be available in late spring - early summer 2008, training for the states will occur in September – October 2008, with states making necessary changes to their management information systems during the July 2008 – June 2009 period. Under this schedule, the states will begin operating under the new WISPR system by beginning to collect the data necessary to enable them to report to the Department using the WISPR forms and formats during the July – September 2009 quarter, with November 15, 2009 being the date the Department would receive the first state quarterly report submissions under WISPR. The first individual record submissions would be due October 15, 2010. With this new timetable, states would have more than a year before they would have to collect data under the WISPR system. The dates in the Handbook have been revised to reflect this updated timetable.
Attachment C: Workforce Investment Streamlined Performance Reporting (WISPR) System - Data Preparation and Reporting Handbook (Page numbers correspond to the location of OMB comments in the printed version of the Handbook)			
3	Page iii: Clarify if the	The term "Jobs for Veterans State Grants" has been	

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	record keeping instructions are for all VETS grants, or only DVOP/LVER. Page 57: Clarification; is the requirement for WISRD for all VETS programs or for the Jobs for Veterans Grants?	inserted in the Handbook and on all related forms in place of "Veterans' Employment and Training Service" to accurately reflect the programs/activities included.	
4	Page 3: Are states required to submit performance information on individuals who receive Alternative TAA service?	Yes, the Handbook has been modified to specify that individuals served by alternative Trade Adjustment Assistance (TAA) are included.	
5	Page 4: How is "financially-assisted" determined if a One-Stop uses a MOU to combine funds from several sources to fund basic services?	In referencing "One-Stop Employment and Workforce Information Services", the Department was referring to the core services provided by the Wagner-Peyser Employment Service and the Veterans programs. The Department has changed references in the Handbook to "Wagner-Peyser Employment Services" to reduce confusion. The Department collects performance information by funding streams; the states report outcomes against each of the funding	OMB: This doesn't answer the question. If a service is funded by multiple funding streams (possibly using a MOU), does each funding stream get credit for the outcomes? How does the reporting system account for this potential double-count of participants? Response: OMB's follow-up question is actually asking two slightly different questions. Per the

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		sources that have provided services to a given client.	Department's original response, if one client's services are funded by several different funding streams, each funding stream had a role in that particular individual's outcome. Hence, the individual's outcome, whether positive or negative, is taken into account in determining the entered employment rate (and potentially the other common performance measures, depending on whether or not the individual attained employment) for each of the funding streams that provided services to the client. The response to the question of how WISPR will account for the potential double-counting of participants follows the same logic as the response to Question 10 below on WISRD files. Although it is already a requirement for states to coordinate the use of a single unique identifier across the WIA and TAA programs for an individual and the Department will encourage that this same practice be used for Wagner-Peyser Employment Service participants for those states that do not have fully integrated systems, it is possible that some double-counting of participants will continue to exist in the reporting system during the first two years of implementation, as it does with the current reporting systems. This will only be for those states that choose to continue

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			submitting separate program reports during the first two years. Starting with the third year of implementation, states will only be able to submit integrated reports which will give the Department an unduplicated count of total participants across the programs as well as counts of participants served by each of the programs.
6	Page 4: What kind of employer services is TAA authorized to fund?	None, the reference to TAA has been deleted.	
7	Page 4: Why is reporting on employer services limited to services funded by the LVER program? Why not any service assisted by the Jobs for Veterans grant?	The Department did not intend to limit reporting to the Local Veterans' Employment Representative (LVER) program; "Disabled Veterans' Outreach Program (DVOP)" and "DVOP" have been added to the text of the Handbook and to the proposed forms.	
8	Page 5 and 19: Why aren't veterans served by WIA included in the ETA 9133 report?	Veterans are not included in the ETA 9133, because this information is being collected through the individual record (WISRD) and separately on the WIA annual report.	OMB: The ETA 9133 is a report on veterans. The question was why it does not include reports of services provided by the WIA programs. Response: To clarify the Department's response, services provided to veterans through their participation in the WIA programs is not included in the ETA 9133, because the information that would

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			be received by doing so is available through other means, namely the individual record (WISRD) and the statutorily-required WIA annual report. As indicated in Response 30, virtually all of the data included in the ETA 9133 report enables the Department to respond to a statutory reporting requirement at 38 USC 4107(c)(1), which applies specifically to the Wagner-Peyser/Jobs for Veterans State Grants programs.
9	Page 6 and 25: Clarify exiter record information; when is someone classified as an "exiter"?	The Department's position on delivering integrated services that best serve a client's needs has not changed; a person should be recorded as an "exiter" only when the individual has completed all One-Stop services, to the extent that states have the capability to track services across partner programs. The following revisions will be included to provide clarification: Page 6: A single electronic data set of WISRD files each quarter. A universe of these WISRD files must be prepared and submitted, that includes a record for each participant, once a participant: 1) has exited **all** of the workforce system programs from which he/she was receiving services, **or** 2) has not received a service from an applicable program for 90 days. An exiter record should be submitted for any participant that meets one or more of the following	

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		conditions: *Inserted after the listing of programs:* Please note that an exiter record **should not** be submitted for the participant until the individual has completed and exited from all of the above programs from which he/she was receiving services, with the exception of instances of reportable outcomes for Youth participants. Page 25: Count of UNIQUE RECORDS *where no service has been received for 90 days for all applicable programs* (WAGNER-PEYSER *and/or* VETERANS' PROGRAMS *and/or* WIA ADULT *and/or* WIA DISLOCATED WORKER *and/or* RAPID RESPONSE *and/or* NEG *and/or* TRADE ADJUSTMENT ASSISTANCE *and/or* WIA YOUTH) **and** DATE OF EXIT is within the report period.	

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10	Page 7: Option B, for grantees that choose to submit separate electronic data sets of WISRD records each quarter, what are the requirements for unique individual identifiers?	The purpose of Option B is to allow states that do not have fully integrated systems to submit separate performance information for each program for the first two years of implementation. It is already a requirement for states to coordinate the use of a single unique identifier across the WIA and TAA programs for an individual and the Department will encourage that this same practice be used for Wagner-Peyser Employment Service participants as well, for those states that choose to use Option B. Option B is only available for the first two program years of implementation. Starting in the third year of implementation, states will only be able to submit Workforce Investment Standardized Record Data (WISRD) records using Option A.	
11/OMB General Question #3	Page 7: What are the data validation requirements for self-reported information if an individual never appears at a One-Stop? How are the data for self-service to be validated? What documentation does	There are no data validation requirements, or required documentation, for self-service participants (which includes those who never appear at a One-Stop), nor does the Department plan to add any requirements. It is not feasible to conduct data element validation, or collect any source documentation, for self-service participants because it would add a significant burden to the public and program operations (retaining records of self-service use) without providing a commensurate benefit.	OMB: The draft handbook on page 7 says "Self-reported information will be accepted for reporting purposes as long as the state meets the applicable data validation requirements." What does this sentence mean in light of DOL's response? Response: The Department's initial response was developed taking OMB's previous question at face value, without taking into account where the question appeared in the Handbook. This question appears in a portion of the Handbook describing the WISRD file submission process; specifically the

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	ETA intend to require for self-service participants?		reporting of outcome information in the WISRD files. Given this context, the sentence OMB references is referring to outcome information provided by the states, that is not based on wage records (often called supplemental data), not self-reported information by individuals. Given this, the appropriate response is that self-reported information (non-wage record information) is acceptable for reporting outcomes, as long as it meets the allowable sources referenced in TEGL 17-05 and the data validation handbooks, to meet applicable data validation requirements.
12	Page 9: Is information on services related to employer assistance not covered by the Employer Services report collected anywhere else? These would include: regular and follow up contacts; information about current/potential job openings/ status of business operations/need for additional services.	In general, this information is not collected by the Department elsewhere. The purpose of the Employer Services report is to capture data that would best describe the types of businesses being served and the services received, while keeping the reporting burden to a minimum. The information specified in the question (regular and follow up contacts; information about current/potential job openings/status of business operations/need for additional services) while interesting, is not actionable at the Federal level. This does not mean that the Department doesn't value this information; it is crucial for local One-Stop Career Center case managers who do outreach to business to collect this and other information in case notes to help them	

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		better serve the customer. The Department is simply not asking for this data to be transmitted to the Federal level, in an effort to minimize reporting burden. Note that employers receiving candidate screening services are accounted for in Row C.2 of the ETA 9131.	
13	Page 12: Will states change column A.2 if an employer changes the number of jobs available in a job order?	Yes, assuming the change occurs in the quarter following the quarter the job order was originally reported, the change would be reflected in column A.2 on the ETA 9131. States have the ability to revise data only for the quarter prior to the current reporting quarter.	
14	Page 14: Delete reference to America's Job Bank.	The Department has deleted the reference to America's Job Bank in the revised Handbook.	
15	Page 14: Will there be any reporting of jobs posted with private sector job banks like JOBcentral, or America's Job Exchange? If not, will states be permitted to count jobs they download?	No, jobs posted to private sector job boards and downloaded into state job boards would not be counted in the report. However, the Department encourages this practice to provide job seekers with access to additional employment opportunities to which they may not be ordinarily exposed. The data collected on job postings will be for those openings that *originated with the state only*. This will provide a more accurate picture of how well the system is serving the business customer. This approach also lowers the risk of capturing duplicate	OMB: Does this mean that job listings from Federal contractors that are required by law will not be counted? Response: No it does not. The Jobs for Veterans Act (JVA) and the revised regulations (Part 60-300) that the Office of Federal Contractor Compliance Programs (OFCCP) published to implement the changes to the federal contractor job listing requirements called for in the JVA, require that contractors and sub-contractors list their employment openings with the appropriate

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		job counts, thus ensuring higher quality data. The Handbook has been modified to include this clarification.	"employment service delivery system." This requirement means that these job openings will be sent directly to a local office, or entered into the state job bank, which makes them "state-originated" job openings, which are included in the count. Posting the job listings with any national job board with the understanding that states will download jobs from that board no longer meets the requirements. Some national job boards are offering a service to help meet the new job listing requirements. They all employ an approach to delivering the job openings to the appropriate "employment service delivery system" that is much more proactive than simply downloading job openings from the site into the state system.
16	Page 16: How are WOTC certifications counted? Is this a reportable employer service?	Work Opportunity Tax Credit (WOTC) certifications are reported on the ETA 9058 report. This report provides a wealth of program information necessary to manage the program. For performance purposes, the Department considers WOTC certifications a reportable employer service as it is provided through local employment service staff. As such, this information can be counted on the Employer Services Report (ETA 9131). The Department has inserted a parenthetical	OMB: What happens in States where WOTC certifications are handled outside the local offices? Response: The primary vehicle for capturing WOTC certification data remains the ETA 9058 report. As such, capturing the full array of WOTC activity in the WISPR system, such as any activity that may occur outside the workforce system (state workforce agency or local offices), is not as crucial. The intent of the WISPR reporting system, and more specifically the ETA 9131, is to capture services provided by the workforce system to employers, which can include

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		reference to the WOTC on page 16 to read: "State and federal tax credits (WOTC) or workforce investment incentives."	WOTC certifications in some instances.
17	Page 17: Where are state activities in support of foreign labor certification programs reported?	Foreign Labor Certification (FLC) programs collect information on employers seeking permanent, or temporary labor certification from the Department. State activities as it relates to the FLC programs are captured on a separate OMB-approved form, ETA 9127. The first phase of integrated reporting includes only the Wagner-Peyser Employment Service, WIA Title I and TAA programs.	
18	Page 33: Why must DVOPs and LVERs be tracked separately? States have a choice on which position to fill with their grants.	The Department agrees with this comment; in the revised version of the ETA 9132 and the Handbook, DVOP and LVER outcomes no longer are tracked separately. Instead, the three outcomes measures are calculated and reported for: a) all veteran participants receiving services from any combination of Wagner-Peyser, DVOP and LVER staff; and, b) disabled veteran participants receiving services from any combination of Wagner-Peyser, DVOP and LVER staff.	
19	Page 52: How is eligibility to participate determined and when is this determination made? How does this relate to registration	The Department believes that collection of data on non-participants should not be constrained by a determination of program eligibility. Non-participants are envisioned as individuals who access the workforce system but do not receive services that would qualify them as participants.	OMB (1): What revision was made? Response: The Department has re-examined this data point within the context of TEGL 17-05, which provides guidance on what qualifies an individual as a participant. This re-examination has resulted in

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	with the Employment Service?	In the case of the Wagner-Peyser/Jobs for Veterans State Grants funding streams, non-participants are equivalent to individuals who, under previous reporting systems, were reported as "job seekers," or "applicants," or "registrants" but received no further services. In the case of WIA, linking eligibility to non-participation is contradictory. That is because those individuals who are determined eligible for WIA and "registered" or enrolled in a WIA program typically have previously accessed self-services, or staff-assisted core services that qualified them as participants. The reporting specification for Row B.1 of the ETA 9133 has been revised to remove the eligibility dimension. (1) The Department believes that non-participants can be reported by program, based upon the source of the funds that support the segment of the workforce infrastructure that these individuals access. (2)	the description of Row 1 on the ETA 9133 being changed from "Total Eligible Non-Participants" to "Total Entrants" and the related reporting specification being revised to read: "Record the total number of veterans or other covered persons who accessed the workforce system, either in-person or remotely. Designation as an entrant occurs prior to receipt of a service, but receipt of a service will likely occur almost simultaneously for many entrants, in which case they are also counted as participants and should be recorded in Row 2." The ETA 9133 has been modified to "grey out" all of the cells in Row 1, except B.1. The Department sees this solution as a step to obtain information on the potential pool of veterans in evaluating access to services by veterans; this line item could be modified later as part of the upcoming Notice of Proposed Rulemaking (NPRM) and associated Information Collection Request (ICR) on priority of service. The specific data collection and reporting requirements for veterans' priority of service will be part of this separate ICR that will serve to modify current reporting systems, or WISPR, whichever is in place when the priority of service regulations go into effect, as discussed in more detail in the further clarification to Response 24

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			below. OMB (2): What does this mean? Which programs can report non-participants – is it only Wagner-Peyser? Response: Yes, only the Wagner-Peyser/Jobs for Veterans State Grants funding streams would report "Total Entrants" on the ETA 9133.
20	Page 61: Are participants required to provide EEO/personal information in order to participate in WIA programs?	No. States and local areas must ask for equal employment opportunity (EEO) data; however, the participant's response is not required. Participants who choose not to provide EEO data will receive the same services as those who provide this personal information. The purpose of asking for such data is to allow the Department the opportunity to analyze the demographic characteristics of participants. Unless required for a determination of eligibility to participate in the program, the collection of EEO information is to be self-identified and is voluntarily provided by the individual. Participants should be made aware of the reason for the request for such information, as well as the parties to whom disclosure may be made. Information collected from the participants will be used to monitor compliance of recipients with the equal opportunity and	

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		nondiscrimination requirements enforced by the Department's Civil Rights Center. It will also be used to assist the grantee and the Department in evaluating and improving efforts to conduct outreach to diverse population groups, including racial and ethnic minorities and persons with disabilities. Additional information about EEO data can be found in Section V.4 – Additional Guidance on the Collection of EEO Data, of the Handbook.	
WISRD Appendix D: *General and Specific Questions*			
21/ OMB General WISRD Question #1	Will DOL collect any information on costs of services provided to individual participants, particularly the costs of training or other expensive intensive services? Why/Why Not?	No, the Department does not require states to report unit costs for training or intensive services. In general, grantees must follow the financial reporting requirements of the prescribed OMB circulars and use the new ETA 9130 financial report to report financial information. Furthermore, section 185(e)(1) of the WIA, requires that quarterly financial reports be submitted by cost category and there are only two cost categories: administrative and program. Any change to collect costs by type of services would require a statutory and/or regulatory amendment.	OMB: This comment ignores the language in section 185(d)(1)(D), "specified costs of the programs and activities." OMB would like DOL to collect unit costs of training or other expensive intensive services so program efficiency and cost-effectiveness can be assessed. Response: As a result of a January 8, 2008 conference call with OMB on this issue, it is the Department's understanding that OMB agreed that WISPR is not the appropriate avenue to collect this type of information.
22/OMB General WISRD Question #2	Where are the SI, SC and I/T services defined? (page 71)	Self-Services and Informational Activities (SI): According to 20 CFR 666.140 (a) (2), self-service and informational activities are those core services that are made available and accessible to the general	

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		public; that are designed to inform and educate individuals about the labor market, their employment strengths and weaknesses, and the range of services appropriate to their situation; and that do not require significant staff involvement with the individual in terms of resources and time. Staff Assisted Core Services (SA): Staff-assisted core services in a workforce investment setting is any assistance provided by staff beyond the informational activities described in Training and Employment Guidance Letter (TEGL) 17-05, Appendix D regardless of the length of time involved in providing such assistance. Significant staff involvement includes a staff member's assessment of a participant's skills; education or career objectives in order to assist a participant secure employment. Intensive (I) or Training Services (T): Intensive and training services require an even higher level of staff support and interaction. Such services include specialized assessment, diagnostic testing, interviewing, development of an individual employment plan, individual or group counseling, occupational skills training, on the job training, skills upgrading and retraining, adult education and	

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		literacy activities in combination with training and customized training for employers. These classifications are defined in TEGL 17-05, *Common Measures Policy for the Employment and Training Administration's (ETA) Performance Accountability System and Related Performance Issues* and in the WISPR Handbook. A brief overview of these definitions has been added to the end of the Appendix D - WISRD Layout, along with a link to TEGL 17-05 for more details.	
23/OMB General WISRD Question #3	How are the data for self-service to be validated? What documentation does ETA intend to require for self-service participants?	This question/concern was addressed in Number 11/OMB Specific Question #3 earlier in this table.	
24/OMB Specific WISRD Question #4	Section A.03, Question 116: Why is it optional to provide information on veterans' characteristics for the SI services? With this information missing, how will DOL be able	In light of anticipated changes to regulations on veterans' priority of service, the Department has decided to address this issue by revising the entire Section A.03: Veteran Characteristics section of the WISRD layout, rather than simply changing the designation for Element 116 (now Element 301) from optional to required for participants at the self-service and informational activities (SI) service level	OMB: When does DOL anticipate providing this to OMB? Katherine – should we try to get at least an informal draft of the NPRM to make sure that DOL will be collecting the data needed to assess the extent to which the States are complying with the veterans' priority of service requirement?

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	to assess the veterans' priority of services?	under the Wagner-Peyser Employment Service/Jobs for Veterans State Grants, WIA Adult, and WIA Dislocated Worker programs. A new Veteran Status element has been added to the WISRD layout (Element 300) that is a required field for all levels of service for all programs covered by the WISPR system. The response required to populate this field is a simple yes/no answer. Eligible Veterans Status (now Element 301) has been revised so it is no longer required/optional for the self-service/informational activities level of service for any of the programs that will be reported through the WISPR system. In addition to making it easier to administer at the state level, it is anticipated that these changes will satisfy most, if not all, of the revisions to the reporting requirements that will result from changes to veterans' priority of service in workforce programs that will be proposed in an upcoming Notice of Proposed Rulemaking (NPRM). The NPRM will propose changes, per the Jobs for Veterans Act, to 20 CFR 1010, to require simple veteran identity to be recorded at the earliest possible point that a prospective participant accesses the workforce investment system.	Response: The Department's response to this issue has changed since it was originally provided to OMB. The Veteran Characteristics section of the WISRD layout (Section A.03) has been revised to obtain better information on veterans' participation in workforce programs. The NPRM on veterans' priority of service will not prescribe the actual reporting requirements; that will be left to a veterans' priority of service ICR that will be part of the Federal Register notice that will announce the NPRM. The veterans' priority of service ICR will amend either the existing reporting systems of the affected programs, or WISPR, depending on what system is in place when the regulations go into effect. The Department will provide a copy of the NPRM to OMB, in accordance with established procedures, as well as the associated ICR during the May – June 2008 timeframe.
25/OMB Specific WISRD Questio	Section A.03, Questions 117-119: Why does TAA not	The Department agrees and has included this as a required response for the TAA programs for veterans, as part of the changes to Section A.03:	Please note that the Department's response to this issue has also changed since it was originally provided to OMB, as discussed in the "Department's

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n #5	have to report on all veterans' questions while the WIA Dislocated Worker program has to report?	Veteran Characteristics of the WISRD layout as described in more detail in Response 24 above and Response 10 in the State Questions/Issues matrix.	Responses" column to the left and the further clarification above.
26/OMB Specific WISRD Question #6	Section A.04, Question 122: Why is UC Eligible Status not collected for the Self-Service/Informational Activities participants? Wouldn't it be useful to find out how many UI claimants are using those services and their success?	The Department's intent regarding the collection of self-service data is to ask for minimal information, so as to not unduly burden the participant. While information regarding the individual's Unemployment Compensation (UC) eligible status could be useful, it would increase burden significantly, as states would have to change the programming on their self-service sites to ask this question before providing any services, which could discourage the use of these services. Further, since the information would be self-reported, there could be significant errors in the reporting of this information, as the concept of "UC eligible" and the appropriate classifications isn't something that is easily comprehensible by someone who doesn't interact with the workforce investment system on a regular basis.	OMB: DOL is requiring other information to be self-reported that may be subject to similar errors. Couldn't DOL ask whether the individual is receiving UI (which is easier to answer then potential UC eligibility)? Response: While the Department could ask whether the individual is receiving UI, the larger issue is the cost burden that states would have to incur to change the programming on their self-service sites to ask this question before providing any services, along with the potential of discouraging the use of these services by individuals who would see such questions as being an overly bureaucratic step between them and the services they are seeking. Further, since this is a "required" field for all other levels of service, and individuals who are profiled as being likely to exhaust UI are referred to a One-Stop to seek additional services, the Department would be receiving information on all of these individuals. Given this, the Department feels that the benefit that could be derived from requiring information on

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			UI eligibility from the remaining individuals that participate in self-service activities only would not outweigh the aforementioned known costs and potential impact on participation.
27/OMB Specific WISRD Question #7	Section B: Several states raised questions about the need for specific dates, especially for the core services. How does DOL plan to use this information?	Specific dates are necessary for program participation and exit because this information is used to calculate the length of participation in a program; to determine any correlation between outcomes and length of service; and to calculate outcomes. If OMB is referring to Elements 406-409 (now Elements 1006-1009), these elements are required to comply with statutory requirements, as discussed in more detail in Response 30. Other dates are collected to enable the Department to determine what service intervention strategy a participant receives and what correlation there is between those services and the outcomes achieved against the common performance measures.	OMB: What analyses has DOL conducted about the length of participation in a program? Please provide the results of such analyses to OMB. Response: The Department's ability to conduct this type of analysis is currently limited, due to several factors, including: 1) individual level information currently only being available for the WIA programs; 2) the number of activities that have dates associated with them being more limited in the current individual level submissions then the proposed WISRD layout; and, 3) a lack of information on whether a participant is being served by another state workforce program when large gaps in service occur. The following is an analysis the Department has performed for the WIA programs, using the information currently available: In Program Year 2006, WIA Adult participants spent an average of 143 days in the program, ranging between 85 days for those who did not receive training and 358 days for those who did receive training. The average

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			length of program participation for WIA Dislocated Workers was 244 days, ranging between 146 days for those who did not receive training and 477 days for those who did receive training. In addition to being able to determine participants' length of program participation, gathering information on service dates in WISPR will allow the Department to analyze trends in how long it takes for a participant to move from one service to the next, the correlation between length of time spent in specific services and resulting outcomes, the impact of co-enrolling individuals in different workforce programs, etc. This type of information would enable the Department to develop specific policy that encourages the best outcomes for program participants, based on actual data.
28/OMB Specific WISRD Question #8	Section B: Please explain the logic of the required response patterns for questions 302-311, especially the duplication with ES/VETS.	The overall concept and response pattern in Section B - One-Stop Program Participation Information in the WISRD layout (now Elements 900-928, formerly Elements 300-327) was to require information on the co-enrollment of participants in all Departmentally-administered workforce programs and to seek information on services provided to the participant by other non-Departmentally-administered One-Stop partner programs. Upon further review, the Department has discovered that the pattern of	Please note that the Department's response to this issue has changed since it was originally provided to OMB. The rationale for the collection of this data remains the same as in the previous response, but some of the response patterns in the WISRD layout were changed after further analysis to eliminate duplicative data collection.

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		requiring information for certain programs is unnecessary because that information is available in other places in the record. For example, it is not necessary to require an entry for Trade Adjustment Assistance (TAA) in the Dislocated Worker (local formula) element (Element 903, formerly Element 303), when it is possible to determine that the participant was enrolled in TAA as a result of the response to the TAA element (Element 919, formerly Element 318). As such, the Department has revised Section B - One-Stop Program Participation Information of the WISRD layout to eliminate required fields for programs where this data is readily available in other parts of the record and is duplicative.	
29/OMB Specific WISRD Question #9	Section B, Question 327: Other reasons for exit are required for all programs, including SI services. How will the states get this information for those using Self-Service/Information Activities only?	The Department proposes to make Element 327 (now Element 928) "optional" for participants in Self-Service and Informational Activities only, as generally this information would not be available for self-service individuals in the absence of case worker follow-up. Further, the ability to track this type of information may vary from state-to-state. This element is used for known cases where the person exited for some other reason than no service for 90 days. In some cases, these reasons will omit the person from inclusion in calculations of the common performance measures.	

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30/OMB Specific WISRD Question #10	Section C, One Stop Services and Activities Questions 406-409: Do these only apply to services from DVOP/LVER, or to any services to veterans, or to any such services to non-veterans as well?	Elements 406-409 (now Elements 1006-1009) reflect statutory requirements (38 USC 4107(c) (1)) that apply to Congressional reporting on services to veterans. The statutory language clearly applies to Wagner-Peyser, as well as DVOP/LVER services, but not to services provided by other workforce programs. These items reflect elements of reporting systems that were in use many years ago and they are less relevant in the current performance measurement environment. The Department is discussing the possibility of a technical amendment to this statutory provision to better align necessary reporting with current approaches to performance measurement.	OMB: Please provide a status report to OMB on this technical amendment. Response: The Department continues to be interested in pursuing a technical amendment to this statutory provision. However, the Department believes that such a request would be better received by Congress when the Department can demonstrate that: 1) progress has been made on the priority of service regulations; and, 2) the data on services received/outcomes achieved by veterans will be enhanced within the new performance environment that will result from the implementation of WISPR.
31/OMB Specific WISRD Question #11	Section C.03: Why are intensive services classified as Staff Assisted Core Services for ES/VETS and as Intensive/Training for WIA? Will this give a misleading picture of the services and the cost-effectiveness of the services? Several states recommended changes.	The Department agrees with this recommendation and will classify these services as intensive/training for Wagner-Peyser Employment Service/Jobs for Veterans State Grant participants. Intensive services provided by DVOP specialists and LVER staff (Elements 430 and 431, now Elements 1205 and 1206) are appropriately included in Section C.03: Intensive and Training Services. In these revised specifications, the Department is specifying that those two items are to reflect: a) conduct of a comprehensive assessment; b) the development of an individual employment plan; c) the completion of both of those service elements to be reported as a	

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		single instance of intensive services; and, d) the reporting of a single instance of intensive services by a DVOP specialist, or a LVER staff member to occur only once within a single period of participation. "Career guidance" provided by DVOP specialists and LVER staff (Elements 411 and 412, now Elements 1201 and 1202) can be considered equivalent to "individual counseling" under the WIA definition and therefore have been renumbered and included under Section C.03: Intensive and Training Services in the WISRD layout. "Attended TAP Employment Workshop" (Elements 427 and 428, now Elements 1203 and 1204) can be considered equivalent to "Group counseling" under the WIA definition and therefore will be renumbered and included under Section C.03: Intensive and Training Services in the WISRD layout.	

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32/OMB Specific WISRD Question #12	Section D: Why are questions 600 and 601 optional for WIA Self-Service/Informational Activities?	These data elements are optional for WIA self-service and informational activities, because individuals participating in WIA receiving self-service only will not be counted in the common performance measures. Section 136(b) (2) (A) (i) of the WIA specifically excludes self-service and informational activities from the core indicators of performance. However, this information is needed for staff-assisted core and intensive/training participants because receipt of these services is cause for including the participant in the common performance measure calculations.	
33/OMB Specific WISRD Question #13	Section D, Question 602: Why would occupational code not be available? How is it collected?	If a participant finds employment on his/her own, and the state/local area relies on wage record data to verify employment, they may not be able to verify the occupation the individual is employed in, because this type of information is generally not contained in wage records.	OMB: Why does DOL require the occupational code at all? What is the value of this information? Is it worth the cost of additional follow-up by One-Stop staff? Response: The occupational code is required because the Department is very interested in learning more about the types of occupations people become employed in after their participation in workforce programs. Specifically, the Department is interested in seeing the extent to which people are obtaining jobs related to the training they participated in, as well as what type of jobs individuals are obtaining as a result of specific types of training. The use of the occupational code, when

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			combined with other data contained in the WISRD files, would also allow the Department the potential to analyze a great number of other things in the future. For example, using the occupational code in combination with state and local area data, the Department could see the extent to which states and regional economies plans align with the results they are achieving; are they placing people into the occupations targeted by their WIA state plans, WIRED strategies, and other economic development efforts.
34/OMB Specific WISRD Question #14	Section D, Question 605: Training-related employment; why is this not required for TAA?	The Department agrees that this would be useful information to collect and has reclassified this element (now Element 1505) as required for TAA participants.	
35/OMB Specific WISRD Question #15	Section D, Questions 611-612: (Employed in 4th quarter after exit and type of employment match). Why is this information not required for TAA but is required for WIA?	This data is collected to comply with statutory requirements under the WIA for its annual report. The fourth quarter data is not used to calculate any performance measures. Thus, collecting this element for all programs would be unnecessary and would add to the reporting burden.	