

Responses to OMB Questions A) from Conference Call on August 26, 2008 and B) Follow-Up on September 22, 2008

1. How will WISPR be affected by the Priority of Service (POS) requirements?

In its current format, the Workforce Investment Streamlined Performance Reporting (WISPR) system is an exit-based reporting system. Records are submitted when the individual exits, or completes, the program(s).

Under the proposed POS Information Collection Request (ICR), a new individual record customer classification, "covered entrants," would be added. This is a classification that denotes a reportable status precedent to the existing "participant" classification. The new classification identifies and captures data on customers at the initial point of entry, i.e., the earliest point that a covered entrant contacts the system either through a physical location (e.g., One-Stop Career Center or affiliate site) or remotely, through electronic means. Thus, the POS ICR adds a new layer to DOL's reporting content and terminology that distinguishes "covered entrants" (those at the pre-participant stage) from "covered participants" (those at the receipt of services stage).

The reporting content associated with the concept of covered entrant is highly specialized and tailored specifically to information requirements associated with veterans' priority of services. These data are not integral to an exit-based performance reporting system and can therefore be evaluated independently. Indeed, the POS ICR is proposed to amend the current reporting systems. When the final content of the POS ICR is determined, WISPR will be amended to include those data elements. Amending WISPR to include POS data elements raises the question of whether these data elements should be simply added to WISPR's reporting content, or whether a broader purpose should be pursued, i.e., tracking a customer's status from "front-to-back" to capture the entirety of the service delivery experience. Doing so moves WISPR in the direction of becoming a case management system rather than a performance reporting system.

2. What is the level of integration of these programs in the states?

ETA's regional office staff assessed the level of integration for reporting purposes among WIA title 1B, Wagner-Peyser/Jobs for Veterans' state grants, and Trade programs in 2005, and at that time about 20 states appeared fully integrated for performance reporting purposes. Another 20 had no level of integration, and the others had integrated two

programs but not the third. We believe the extent of integration that prevailed in 2005 reflects the current level of integration. Notably, however, several states are making MIS changes now in anticipation of the integrated reporting WISPR will achieve.

3. Q#8: How will POS affect ETA 9133?

Grantees would submit quarterly information on the three data elements listed in the chart below. This information is currently planned to be in the form of a stand-alone report for each of the affected programs (see chart below).

ITEM	Current Quarter*	Cumulative Four Quarters*
1. New Covered Entrants		
2. Un-served Covered Persons		
3. Served Covered Persons		

4. Q#15: What job postings will be counted as state postings on the Employer Services report? ETA states that the data collected on job postings will be for those openings that originated with the state only; why would the jobs posted on private sector job boards and downloaded into state job boards not be counted?

The Employer Services report will measure how well the system is serving employers. Counting jobs that are listed with the state directly by employers gives an indication of how well a state is cultivating relationships with employers. The download of job openings is passive, and therefore does not reveal a clear connection to performance in serving employers (only how good their IT systems are). Further, the number of downloaded jobs can overwhelm the number of jobs the state gets directly from employers, making this data meaningless.

5. Q#16: Will WOTC certifications be counted?

Yes, they will be counted as an employer service.

6. Q#19: What modifications to WISPR will be necessary based on the NPRM and ICR for POS?

The WISPR system could be amended to incorporate the three entrant data elements (see above). From a technical standpoint, there could be a

front end, pre-participant component of WISPR to capture the initial point of entry data for covered persons.

7. Q#25: Will Trade respond to the veterans' data elements?

Yes, the forms have been modified to require Trade programs to respond to the veterans' data elements.

8. Q#26: Why not collect Unemployment Compensation (UC) eligible for self-services?

ETA does not want to burden the individual who is accessing self-services only. Further, since this is a "required" field for all other levels of service, -- and individuals who are profiled as being likely to exhaust their Unemployment Insurance (UI) are referred to a One-Stop to seek additional services -- ETA would already be receiving information on all of these individuals. Therefore, ETA believes the benefit from requiring information on UI eligibility from the remaining individuals accessing self-services only would not outweigh the known costs and potential negative impact on participation among self-service customers.

9. Q#28: What was changed in the WISRD layout?

The following items are no longer required in the Wagner-Peyser and Trade Adjustment Assistance columns because they are already required through participation in WIA:

- Adult (local formula), Item 902
- Dislocated Worker (local formula), Item 903
- Date of first Youth Service, Item 904
- Youth (Statewide 15% Activities), Item 905
- Dislocated Worker (Statewide 15% Activities), Item 906
- Adult (Statewide 15% Activities), Item 907
- Rapid Response, Item 908
- Rapid Response (Additional Assistance), Item 909
- NEG Project ID, Item 910
- Second NEG ID, Item 911

10. Q#30: Will the data elements here [in question 30] need to be revised for Priority of Service?

No. The discussion in ETA's matrix referred to a possible technical amendment to the statute. Question #30 refers to elements 406-409 (now elements 1006-1009), which reflect statutory requirements (38 USC 4107(c) (1)) applying to Congressional reporting on services to veterans. The statute 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. They are less relevant in the current performance measurement environment, and they are not related to POS.

11. Q#33: What's the response rate on occupational codes? What is the value of the responses if the response rate is low?

In PY 2005, about 22 percent of records (111,872) were coded for Occupational Category of Training, dropping to 14 percent (108,895) in PY 2006. In PY 2005, about 21 percent of records (108,776) had codes for Occupational Category of Job, dropping to 7 percent (57,053) in PY 2006. Delaware, Missouri, New York, North Carolina, and the Virgin Islands did not report any data on occupational codes.

The challenge to states in providing this information derives from the fact that states and local areas rely on wage records to verify employment. States may not have personal followup with customers to ascertain the occupational category in which they found employment. While response rates are low, states have reported the information on enough exiters to make the information worthwhile, especially because Congressional staff and Administration officials often inquire about the types of training the workforce system provides and the occupations of program completers. These data are ETA's only information on the kinds of jobs people are trained for compared with the kinds of jobs they obtain.

12. Is occupational information collected in evaluations for WIA and TAA?

The TAA evaluation asks the participants/comparison group members "What kind of company [did you work for]?", "What did they do or make?" and "What did you do there?" The evaluation also asks for the industry code and occupation. The WIA Quick Study uses solely administrative data and does not include the occupation category. Lastly, although ETA is still in the design phase of the broader WIA evaluation, ETA will include occupational information questions in its design.

RESPONSES TO OMB QUESTIONS FROM SEPTEMBER 22, 2008

Item 4, Q#15. **We understand why DOL wants the information on job listings secured by the One-Stop staff. However, we also believe that it would be useful to know how many job listings the States have in their job banks. We suggest that DOL add a question on total jobs listed. Alternatively, does DOL have another source of information on the number of jobs in the State job banks?**

DOL has modified ETA Form 9131 to add this item in the report and has modified the Handbook to provide the instructions below.

ETA Form 9131:

Performance Information	Previous Quarter (A)	Current Quarter (B)	Cumulative 4-Qtr Period (C)
B.2 STATE JOB BANK HOLDINGS			
Total number of job bank listings			

Instructions for Handbook:

This section collects information on the total number of active jobs listings included on State sponsored job banks. A *job listing* is defined as a job order containing one or more job openings that an employer intends to fill. States are instructed to report job listings only where the original job posting date falls within the current quarter (Column B2) and most recent four-quarter reporting periods (Column C2). A job listing with an original job posting date outside of the applicable reporting periods must not be included in the total counts, even if the listing continues to be open or active. All job listings reported under section B.2 must be based solely on whether the original job posting date is within the applicable reporting periods.

Although section B.3 explicitly excludes job postings initially listed with third-party job boards, this section includes job listings from third-party job boards in the total number of job bank listings. This accounts for the fact that many states download job listings into their state job bank systems from a variety of external sources.

Item 11 Q#33. Please expand on the discussion of the number of records coded for occupation codes. [Previous response at bottom of this response] Why did the percentages drop between 2005 and 2006? Is the lower rate expected to continue? For the records coded for Occupational Category of Training, were these all records, or only those records for training participants? If the records are for training participants and recording of occupations is so low, why? Is DOL planning to follow up with the States on this?

The previous response regarding occupational category of training was in error because it was not limited to cases where the individual received training. The occupational category field is required only for those who, in fact, have received training services. Thus, for those who received training, 53.9 percent of records for Adults (60,742 cases) and 58.4 percent of records for Dislocated Workers (48,095 cases) were coded for Occupational Category of Training in Program Year 2005.

In Program Year 2006, 54.5 percent of records for Adults (59,669 cases) and 60.9 percent of records for Dislocated Workers (46,986 cases) were coded for Occupational Category of Training in Program Year 2006. Therefore, the response rate among those who received training did not drop.

ETA has conducted webinars with states about performance reporting requirements, and we emphasize the importance of completing these data fields.

When ETA receives the Program Year 2007 records, we will followup with any state that has not completed the data field to remind them of the importance for doing so.

Previous Response:

What's the response rate on occupational codes? What is the value of the responses if the response rate is low?

In PY 2005, about 22 percent of records (111,872) were coded for Occupational Category of Training, dropping to 14 percent (108,895) in PY 2006. In PY 2005, about 21 percent of records (108,776) had codes for Occupational Category of Job, dropping to 7 percent (57,053) in PY 2006. Delaware, Missouri, New York, North Carolina, and the Virgin Islands did not report any data on occupational codes.

The challenge to states in providing this information derives from the fact that states and local areas rely on wage records to verify employment. States may not have personal followup with customers to ascertain the occupational category in which they found employment. While response rates are low, states have reported the information on enough exiters to make the information worthwhile, especially because Congressional staff and Administration officials often inquire about the types of training the workforce system provides and the occupations of program completers. These data are ETA's only information on the kinds of jobs people are trained for compared with the kinds of jobs they obtain.