

APPENDIX H
PUBLIC COMMENTS

**Comment Request for Information Collection for the
Workforce Investment Act (WIA) Adult and Dislocated Worker Programs
Gold Standard Evaluation**

Response to Comments

The U.S. Department of Labor, Employment and Training Administration (ETA) published a notice of new data collection for the Workforce Investment Act (WIA) Adult and Dislocated Worker Programs Gold Standard Evaluation in the Federal Register on June 25, 2012 (Federal Register, Volume 77, Number 122, pages 37923-37926). This document responds to the two comments received—one from a private citizen and another from a local site participating in the WIA Evaluation—during the comment period, June 25, 2012 through August 24, 2012.

Comment: The private citizen questioned the value of the evaluation, especially during poor economic times.

Response: It is important that we conduct this study. In the 14 years since the WIA was enacted, its service components have never been rigorously evaluated. We need to learn if WIA-funded intensive services and training are as effective as they can be. This is especially important now when so many people are out of work and seeking services to help them transition to new employment opportunities.

A participating local site expressed full support for the research addressing the effectiveness of WIA services, but submitted comments about the new data collection included in the Federal Register notice. The comments and the study team responses follow:

Comment: The commenter expressed concerns for the estimated length of the survey—40 and 30 minutes for the 15- and 30-month follow-up surveys, respectively—and the burden on customers. The commenter also indicated that this length could be longer when the survey is administered to customers who are Limited English Proficient (LEP).

Response: Mathematica has successfully administered surveys of this length with similar populations for studies conducted for the U.S. Department of Labor as well as for other agencies. However, we recognize that such surveys introduce burden and address this in several ways. First, customers who complete the survey will be paid \$25 as a token of appreciation and acknowledgement of their time. Second, appointments to conduct interviews will be scheduled at the convenience of each customer. Furthermore, customers can complete the interview in more than one call if they prefer to do so. (We have found that most respondents complete surveys of this length in one call.) The survey has been comprehensively pretested with local WIA customers, and they were able to complete the survey without problem. Finally, most customers will not be required to answer every question in the survey. The questionnaire is designed to skip questions (and even entire sections) if it does not apply to a particular customer's situation.

For customers who are limited English proficient (LEP), we do not expect the length of administration to be doubled. First, to address the needs of Spanish speakers, the survey will be developed and administered in Spanish as a standard practice. Thus, the administration of the

survey to Spanish speakers should be similar to the administration for English speakers. Second, for people who speak neither English nor Spanish, the same option of completing the survey in multiple calls is available. Mathematica staff will be used as interpreters when possible, and we will employ interpreter services for languages for which staff are not available and the demand warrants it.

Comment: The commenter suggested that the study find avenues other than the surveys to collect data on the services participants receive. For service use data, the commenter notes that quarterly extract data is already planned from WIA databases.

Response: The survey is a critical source of information that we cannot obtain from administrative data. Most importantly, without the survey data, we would not obtain information about the employment and training services that customers receive outside of the WIA program. The study needs to capture this information for all customers in the evaluation in order to estimate the effects of WIA intensive and training services on customers.

As indicated by the commenter, the study team is collecting local areas' WIA administrative data. We intend to use these data to confirm that customers have maintained their study group assignment and to describe WIA services received by customers. However, often, local areas' administrative databases do not provide the detail about services required for the evaluation. For example, the administrative data might inform us that the customer has received intensive services, but not whether the service received was an intensive workshop or a counseling session. Through the survey, we will be able to collect this detailed information.

To be sensitive to the burden on customers, we do intend to rely on administrative data when available. For example, the study team will be collecting unemployment insurance information from state databases, so we will not ask customers about their receipt of unemployment insurance.

Comment: The commenter recommends that the team consider using a Web-based survey methodology for the follow-up surveys as well as electronic submission of responses in the other two proposed data collection efforts—the cost collection and Veterans' Supplemental Study (VSS). For the survey, the commenter notes that electronic-methodologies may increase the efficiency of the survey data consolidation process.

Response: Based on our experience, we believe that computer-assisted telephone interviewing (CATI) is the best option for completing the follow-up surveys. Many customers will not have Internet access at home and will therefore need to use public facilities such as libraries or WIA offices to complete a web-based survey. Also, it is more likely that a respondent will start a web-based survey under these circumstances and not complete it than is the case with a telephone interviewer. In addition, Mathematica's survey staff will offer customers flexibility when scheduling the CATI interview to meet the needs of each customer, and trained interviewers will be able to clarify questions if needed, improving the validity of responses and increased responses overall. The CATI administration provides the same benefits of consolidating the data as we would achieve with a web-based survey. CATI interviewers enter respondents' information during the interview.

The cost data collection package provides a format for describing the types of data needed for the study's analysis of the effectiveness of WIA services. We will encourage local areas to submit these data electronically if they are able to do so.

The VSS qualitative component does not lend itself to electronic submission of responses. In our experience, in-person meetings with staff and customers are invaluable to learning about how services are delivered. Both perspectives are important, and face-to-face discussions often elicit responses that one cannot obtain through other methods.

Comment: The commenter stated that the planning for the WIA Evaluation site visits takes a minimum of 40 hours and suggested that the burden estimate for the VSS on-site data collection include this staff time.

Response: We agree that planning the site visits requires staff time. Thus, we have added 4 hours per site for staff to coordinate the VSS portion of the second round visits. The full burden for the coordination of the WIA Evaluation site visits, which were cleared under a previous data collection package, is outside this clearance request.