

Department of Labor

Information Collection Request

DOL-Only Performance Accountability, Information, and Reporting System

Summary of 60-day Federal Register Notice (FRN) Comments and Responses

Executive Summary (Overview of Document)

The Department of Labor (DOL) published a 60-day Notice in the Federal Register (FRN) seeking public comments on the DOL-Only Performance Accountability, Information, and Reporting System, Information Collection Request (ICR) on May 23, 2017 (82 FR 23604) (OMB Control Number 1205-0521).

This document provides a summary of the 26 sets of public comments received in response to the 60-day comment Notice on the DOL only ICR and the Department's responses to those comments. The Department has organized this Summary of Comments and Responses by issues raised by the commenters, the particular forms of the ICR documents and by programs.

The comments are organized into 11 sections as outlined in the table of contents below. Each comment contains a comment number in the first column. The actual comment received appears in the second column. The third column provides the agency's response. Finally, the fourth column indicates the frequency of the comment (i.e., how many times the same or a similar comment was received) from the 60-day comment period. Lastly, instead of repeating responses to comments that solicit the same response, the Department cites the response in the appropriate section. For example, "See response for PIRL #1" cites the response for the first comment in the PIRL section of this document.

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AMENDED DOL-Only ICR - COMMENT RESPONSES			
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DOL-ONLY PIRL			
1.	<p>1801 - Date Attained Recognized Credential says the Instructions were updated but it still references the second recognized credential.</p> <p>"Record the date on which the participant attained a recognized credential.</p> <p>Leave blank if the participant did not attain a second recognized credential, or if this data element does not apply."</p>	<p>The Department agrees with the comment and has revised the definition of PIRL 1801 as recommended by the commenter.</p>	1
2.	<p>1800, 1802, and 1804 - Removing the value "4 = Graduate/Post Graduate" and then re-numbering the following values will cause a problem for systems that are setup to store the numerical (alias) value in their database.</p> <p>Making this change requires that everyone (who has already tracked a value 4, 5, 6, 7 or 8) goes back into their data and maps the old values to the new values. This is generally a consideration that is made for all text/alias value fields. Storing values as an alias makes it so you don't have to go back and update all of your data when a change to the text is made. It also requires that you do not ever change the alias value to a completely new value.</p>	<p>The Department disagrees with this recommendation and did not revise the coding values as suggested by the commenter.</p>	1

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	It would make things easier and cause less confusion if numbers 5-8 were not changed to 4-7.		
3.	<p>Why does the "Reportable Individual" (column F) column exclude the letter "R" (indicating a required field) for proposed PIRL data elements 903, 904, 905 and 918, while including "Reportable Individual" (as shown below) in their corresponding CODE VALUE, ?</p> <p>PIRL data element 903 - Adult (WIOA) / CODE VALUE "4 - Reportable Individual"</p> <p>PIRL data element 904 - Dislocated Worker (WIOA) / CODE VALUE "4 - Reportable Individual"</p> <p>PIRL data element 905 - Youth (WIOA) / CODE VALUE "4-Youth Reportable Individual"</p> <p>PIRL data element 918 - Wagner-Peyser Employment Service (WIOA) / CODE VALUE "2 - Reportable Individual"</p>	The Department agrees. These elements are now marked for reportable individuals.	1
4.	<p>Why does the "Reportable Individual" (column F) column exclude the letter "R" (indicating a required field) for proposed PIRL data elements 900 - Date of Program Entry (WIOA) and 901 - Date of Program Exit (WIOA)?</p> <p>Both of the data elements 900 and 901, referenced above are required to calculate performance measure A.3 Total Reportable Individuals on ETA-9173 WIOA Quarterly Report.</p>	The Department has made changes to the specifications for calculating Reportable Individuals in response to this comment. PIRL 900 and PIRL 901 are used to determine the start and end of participation, and therefore cannot be used for Reportable Individuals.	1
5.	307 - TAP Workshop in 3 Prior Years	The Department agrees with the commenter and has removed this requirement	1

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	Why is this element required for WIOA Youth, but not WIOA Adult/DW/DWG as all of the other veteran elements are?	from the WIOA Youth column.	
6.	<p>1303, 1310 and 1315 vs. 2109 - 2117 for H-1B Programs.</p> <p>Why is it required to track 1303, 1310 and 1315 (Type of Training Service #1 - #3) for H1-B programs if they are also required to track 2109 - 2117 (Primary Secondary and Tertiary Type of Training Services for Training #1 - #3)? This seems like it is the same information being asked for based on the field names being almost identical and the values being collected are almost the same.</p> <p>If they are tracking different information, could you list in the Definitions/Instructions what the differences are and when you should track one set of fields versus the other?</p>	<p>PIRL data elements 1303, 1310 and 1315 (Type of Training Service #1 - #3) are required to calculate WIOA primary indicators of performance, of which H-1B grants are also reporting against. These PIRL data elements are necessary in order to aggregate outcome measures for the WIOA primary indicators of performance.</p> <p>PIRL 2109 - 2117 (Primary, Secondary and Tertiary Type of Training Service for Training Activity #1 - #3) are distinct from, but related to PIRL 1303, 1310 and 1315 (Type of Training Activity (WIOA) #1, #2, and #3). Grantees may report up to three types of training services (PIRL 1303, 1310, 1315) and for each of these data elements may also record up to three training types for each participant (PIRL 2109-2117). In total, up to nine training types may be recorded under PIRL 1303, 1310 and 1315. This approach provides flexibility to grantees that are providing multiple types of training to individual participants.</p>	1
7.	<p>302 - Campaign Veteran</p> <p>Why is this element required for WIOA Youth, but not WIOA Adult/DW/DWG as all of the other veteran elements are?</p>	The Department agrees with the commenter and has removed this requirement from the WIOA Youth column.	1
8.	<p>How should Title-I code someone who earns a graduate/post graduate degree?</p> <p>Graduate/Post-Graduate has been removed from the code values for 1800.</p> <p>If we don't enter something for 1800/1801, the participant will</p>	All grantees that are required to report on PIRL 1814 should use PIRL 1814 to report the date attained Graduate/Post-Graduate Degree. For some programs, such as the title I Adult and Dislocated Worker, it is allowable to provide training leading to a Graduate/Post-Graduate degree.	1

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	<p>not get credit for the Credential Attainment.</p> <p>Credential specs (numerator):</p> <p>...or (If Funding Stream is VOCATIONAL REHABILITATION and (VOCATIONAL REHABILITATION = 1 or 3) and (DATE ATTAINED GRADUATE/POST GRADUATE DEGREE - DATE OF PROGRAM EXIT <= 365)</p> <p>Would this be the correct way to code their PIRL record?</p> <p>1800 Type of Recognized Credential = 7 - Other Recognized Diploma, Degree, or Certificate?</p> <p>1801 Date Attained Recognized Credential = date degree earned</p> <p>1814 Date Attained Graduate/Post Graduate Degree = date degree earned</p>		
9.	<p>PIRL Element 1101 is currently "Most Recent Date Accessed Self-Service Workforce Information Services". It is being proposed to remove "Self-Service". With the removal of "Self-Service", this element now appears to be the same as PIRL Element 1103 and why are there two data elements asking for the same information?</p>	<p>The Department has made changes to better clarify the different elements for the basic career services that only apply to reportable individuals. This includes a change to PIRL 1101 to clarify that it references self-services, including self-directed job searches. There are also changes to PIRL 1103 clarifying that it is applicable to reportable individuals. These changes more clearly outline that PIRL 1100, 1101, and 1103 represent information-only activities, self-services, and workforce information services, respectively. In order to align to these changes, revisions were also made to PIRL 1000 and PIRL 1002, that are roll-ups of the three reportable individual services elements (PIRL 1100, 1101, and 1103).</p>	1

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10.	PIRL Element 1300 Received Training (WIOA) is proposed to include reporting by Wagner-Peyser and JVSG. These are programs that do not provide training but may refer individuals to training. What is the intent with requiring this data element for Wagner-Peyser and JVSG?	Although Wagner-Peyser and JVSG cannot provide training, it is valuable to know which co-enrolled participants have received training. The Department will keep this requirement.	1
11.	<p>Elements 204 to 209 for those who Identify themselves as Having a Disability 1</p> <p>Originally these elements were in a separate section of the PIRL and in response to previous 2 comments, DOL indicated that it worked to “revise and reduce the number of elements ... resulting 3 in the deletion of some data elements and the combining of other data elements.” That doesn’t quite 4 get to the original comment. While it is true that DOL made changes, the changes amounted to 5 splitting one element into 3 and eliminating 3 elements relating to recent employment which are easy 6 to gather and might have been useful to obtain on all Participants, not only those with disabilities. 7 The following table shows the change between the 30-day draft DOL ICR from April 2016 to the 8 Final DOL PIRL from June 2016:</p> <p>Front line staff are not likely to easily understand Elements 204-209 which are all highly complicated 10 and that are generally not applicable eligibility determination or service delivery in the context of most DOL programs – even for those individuals with disabilities. Ironically, many of these elements are more</p>	<p>While the Department understands the complexities of collecting and tracking data, it is important for front-line staff to learn new methods in which to collect data through professional development. This data can be used in an abundance of ways such as, but not limited to:</p> <ul style="list-style-type: none"> - Assist AJCs and their partners in identifying common service trends, barriers or referral options relative to the accessing of multiple services for people with disabilities. - Help AJCs get a better understanding of the services that individuals with disabilities are currently receiving through other systems so as to decrease silos and leverage a more holistic approach to service delivery through IRTs and other partners. - The data will help AJCs that have created new WIOA MOUs to better engage with their disability specific state partners by using the data to identify and establish baseline data which can provide a more enhanced goal tracking system and lead to better outcomes for individuals in career pathways and other AJC services. - Tracking of the data will help the DOL get a better understanding of the actual outcomes that are resulting under WIOA and the new requirements relative to CIE and other work options through Customized Employment. <p style="margin-left: 40px;">o Analyzing these outcomes will also assist the DOL to identify needs</p>	1

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	complicated than those required of Title IV grantees by the Department of Education in the RSA911 report. Given that this level of detail is not required in the Title IV program, where it would be far more relevant, we recommend that elements 204-209 be removed from the DOL PIRL.	<p>to provide targeted technical assistance in areas where outcomes are lacking.</p> <ul style="list-style-type: none"> - Using the data to apply for grant funding outside of the traditional government funding sources 	
12.	<p>Elements 309 to 314 for Homeless Veterans Grants 16 (Commenter) is a strong supporter of veterans and has a number of important initiatives that go well beyond 17 basic job search assistance and training. However, we never heard of the HVRP programs before 18 these elements were proposed in the PIRL. We have been able to locate very little information on 19 them. When we asked DOL staff where we were to get this information we were told that HVRP 20 case worker would provide it with the referral to the Onestop. We've not been able to find an 21 instance where we received any such referral. We don't support IT system changes and additional 22 training to report data on programs that we don't operate. In particular, we object to the requirement 23 that we provide information on why a Participant is being served by multiple HVRP programs that we 24 don't operate (Elements 312 and 314) – even if the HVRP grant operators were to give us referrals, 25 why would they tell us why a homeless veteran was served by more than one HVRP grantee? What 26 business is that of ours? If DOL wants to utilize the PIRL for HVRP reporting, then we recommend 27 that they make these elements only applicable for those program grantees</p>	<p>The Department agrees with the comment and will remove the element as required for collection for Reportable Individuals. It will remain a requirement for participants. Per TEGL 04-16 and VPL 03-16, HVRP grantee staff is required to be present when a veteran is enrolling into a workforce program at an AJC and will provide the 5-digit grant number.</p>	1

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	and not impose these 28 reporting requirements on Title III grantees who do not administer the grants. It is not reasonable to 29 divert resources needed for programs we are responsible for to report activity in programs we’re not. 30 In addition, it is particularly unreasonable to require this information on Reportable Individuals who 31 are not Participants since most of them will be self-serve-only individuals, who likely won’t know their 32 HVRP grantee’s IDs.		
13.	<p>Elements 936-937 for Ex-Offenders and 938 for the H1B Grant # 1</p> <p>As was the case with the HVRP elements, we object to being expected to report information on 2 grants that we’re not responsible for and recommend that DOL make these elements only required 3 for those grantees operating the programs.</p>	<p>For REO Adult, REO Youth, and H-1B programs, these elements are required as they represent the funding stream elements for these programs to indicate participation. For the other programs that these elements have been marked as required, these elements are used to indicate that a participant is co-enrolled. If co-enrollment status is not known, these should be left blank. If the participant is co-enrolled, but the grant number is not known, grantees should enter “99999999999999”. The Department notes that REO (Adult and Youth) is a required one-stop partner program.</p>	1
14.	<p>MSFW 34</p> <p>While we support the simplification of the MSFW elements, we don’t understand the need for both 35 Element 413 and 808. Element 413 seems to use a looser standard than Element 808 for being 36 considered a Seasonal Farmworker (SFW). Under Element 413, a person is a SFW if they did farmwork 37 on a seasonal or temporary basis in the prior 12 months. Under Element 808, “SFW” status is based on 38 working 12 consecutive months out of the prior 24 months in agriculture</p>	<p>States have a responsibility under Wagner-Peyser regulations to provide employment services, benefits, and protections to migrant and seasonal farmworkers (MSFWs) on a basis that is qualitatively equivalent and quantitatively proportionate to services provided to non-MSFWs. The Monitor Advocate System is the method by which the Department, by monitoring established service level indicators, ensures the equitable provision of Wagner-Peyser Employment Services (ES) to these two populations(MSFWs and non-MSFWs) of participants in the WIOA title III ES program.</p> <p>Local ES offices must determine whether participants are MSFWs as described in 20</p>	1

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	(plus a number of other stricter 39 factors). We believe having the 2 different standards creates confusion for staff and needlessly 40 complicates the registration process. We recommend that DOL work with the Department of Education 41 to identify a single, streamlined MSFW data standard and apply it consistently across the programs 42 using a single element (removing Element 413).	CFR 651.10. PIRL 413 is used for this purpose. Whereas, PIRL 808 is used both to define the population of eligible migrant and seasonal farmworkers that count towards the WIOA mandated “individual(s) with a barrier to employment”. It is also the definition NFJP grantees use to determine eligibility to be served through the NFJP program. The Department has made changes to require that PIRL 413 is only required for Wagner-Peyser participants.	
15.	Removal of “Graduate/Post Graduate” under Type of Recognized Credential, but then Creating 24 “Date Attained Graduate/Post Graduate Degree” 25 This change doesn’t seem to make sense. Graduate/Post Graduate is removed as a type of credential 26 assumedly because it is generally not applicable to most WIOA programs. If so, why add a new 27 element for “Date Received Graduate/Post Graduate Degree”? The original PIRL provided for reporting 28 that information by selecting it as the type of credential and then using the date credential achieved 29 fields.	See response for PIRL #8.	1
16.	Element 307 requires us to report if a veteran or Transitioning Service Member attended a TAP workshop in a 3 year period prior to the date of participation. Why does this element single out WIOA Youth but exclude Adult, DW, and Trade? It seems like there aren't many youth who would fit into this category if any at all. We understand this is an appropriate element for Jobs for Veterans State Grant and Wagner-Peyser but we do not	The Department agrees with the commenter and has removed PIRL 307 as a requirement from the WIOA Youth column.	1

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	understand why WIOA Youth were added		
17.	The data element definition for element 411 and 412 specify Trade Act. If the definition specifies Trade impacted customers only why is it required for Wagner -Peyser? Utah believes these elements are more appropriate for Trade customers only.	The Department agrees with this comment and will no longer require PIRL 411 and PIRL 412 as requirements for Wagner-Peyser.	1
18.	Element 704 added a requirement to capture Foster Care Youth status for Wagner Peyser customers. This increases the burden of reporting for customers receiving limited staff assisted services. How is foster care information beneficial for Wagner Peyser customers seeking assistance finding employment? There is also no age limit for this question so, a customer may have aged out of foster care 20 or 30 years ago and we are still asking them for this information. We recommend removing this requirement for Wagner Peyser and for Adult and DW customers over 25.	The Department revised the specifications to clarify that PIRL 704 only needs to be collected for individuals that are age 24 or younger at the time of program entry.	1
19.	Element 808 adds additional burden of separating out customers by age. Since age is already a required element why add an additional burden on this element? The data element name states Migrant and Seasonal Farmworker Status at National Farmworker Jobs Program Entry. The data element name is inconsistent with the added requirement to report this for Wagner Peyser , Adult, DW, Youth, and DWG. Utah recommends this element be applied only to NFJP and to remove the age breakout.	See response for PIRL #14.	1

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20.	Element 1900, 1901. The code values for youth placement 2nd quarter and 4th quarter removed unsubsidized employment, registered apprenticeship and military. These code values capture program exit reason and meet the indicators of performance requirements. Why are these exit reasons excluded from this data element?	Code values 1-3 in PIRL 1900 and PIRL 1901 were removed because they were moved to PIRL 1602 and PIRL 1606. For the 2nd and 4th quarter youth indicators, unsubsidized employment, registered apprenticeship, and military will now be captured in PIRL 1602 and PIRL1606, code values 1-3.	1
21.	Element 805. Can you provide additional clarification or examples of cultural barriers?	The Department is allowing the State to define cultural barriers.	1
22.	Element 1301, 1304, 1305. For WIOA Youth, why would it not be required to report the Eligible Training Provider Name? Out of School Youth are required to use an Eligible Training Provider and so it would be appropriate to report by provider.	Out-of-school youth are only required to use an Eligible Training Provider if an Individual Training Account (ITA) is used. If an ITA is not used for youth occupational skills training there is no requirement to use an Eligible Training Provider. Therefore, these data elements are not required for the youth program and should only be completed for WIOA youth when an out-of-school youth uses an ITA.	1
23.	PIRL Items 300 through 310: It appears that based upon WIPS Schema changes, by PIRL program file, published on 4/6/2017, these fields were not taken into consideration on the Federal Register ETA 9172 document. For example, PIRL items related to veterans #300 through 310 are inconsistent with attached Federal Register ETA 9172 documentation.	Since the WIPS Schema change on 4/6/2017, there were revisions to PIRL 300-310 that would not have been included in the schemas updates on 4/6/2017.	1
24.	PIRL 909- Why is Rapid Response Additional, required for WP and JVSG reporting? Additional is reported for WIOA Dislocated Workers.	The Department agrees with the commenter and has removed this requirement from the Wagner-Peyser and JVSG columns.	1
25.	PIRL 1101 is currently defined as Self-Service Workforce Information, and the listed change removes the "self-service"	See response for PIRL #9.	1

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	wording. PIRL 1103 is currently defined as Staff Assisted Workforce Information - with the removal of "self-service" from 1101, the 2 fields appear to have the same definition.		
26.	PIRL Field 1401 under the PIRL Tab Changes: field 1401 to be renamed "Enrolled in Secondary Education Program" removing "at Program Entry." We agree with the deletion of "at Program Entry" because the definition allowed enrollment during participation. Because the new definition listed has GED and other High School equivalent indicated, the name of the field should reflect the new definition, "Enrolled in Secondary Education, GED, or High School Equivalent Program" more closely reflects the definition listed.	The definition of PIRL 1401 defines a Secondary Education program as both secondary school enrollment and enrollment in a program of study with instruction designed to lead to a high school equivalent credential. Because the definition clearly includes high school equivalency programs there is no reason to further change the name of the data element.	1
27.	<ul style="list-style-type: none"> PIRL Field 1814, Date Attained Graduate/ Post Graduate Degree for RSA only: Listed as required for WP, Adult, DW, DWG, TAA and Youthbuild. This is not an option under Title I or Title III, so why is this field required if it is just for RSA. WIOA regulations list allowable degrees through Baccalaureate, not post graduate for Title I. Basically, the field should not be required for the programs outside of RSA. 	See response for PIRL #8.	1
28.	<p>#1101: Most Recent Date accessed Workforce Information Services</p> <p>Because the words "self-service" were removed from the description, does this mean that we are only supposed to report staff assisted workforce information services? Or, any Workforce</p>	See response for PIRL #9.	1

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	Information services provided by self-service or staff assisted?		
29.	#1800: Type of Recognized Credential (WIOA) Graduate/Post Graduate degree was removed from one of the types of credentials to report, however, in the data element definitions/descriptions, there is still a reference to “master’s degree”. Maybe this was just an oversight?	Per the commenter’s suggestion and to align with proposed changes to the PIRL, the Department has deleted “or master’s” from the definition.	1
30.	#1813: Date Completed Training This is odd because it explicitly states that it includes education that began before program enrollment. So it looks like we are expected to record completion dates for education we had nothing to do with. If true, this likely requires an entirely new field as training completion is currently tied to services provided.	PIRL 1813 is intended to record the date training was completed at any time during participation. If training was completed prior to participation, then the date would not be recorded in this field. The data element definition states that it can be training or education that begins prior to program entry. Therefore, PIRL 1813 is not asking for the date the participant began training, but the date they completed training during participation.	1
31.	#1814: Date Attained Graduate/Post Graduate Degree This was explicitly removed from the type of recognized credentials so not sure why we are reporting this on the PIRL (for DOL programs).	See response for PIRL #8.	1
32.	PIRL 302 – Campaign Veteran a. The change for this element is to make this a requirement for Wagner-Peyser and WIOA Youth. Currently this element is only required for Trade and JVSG. We do not see this as a productive use of staff resources as very few youth participants fall into this	The Department agrees with the commenter and has removed this requirement from the WIOA Youth column.	1

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33.	PIRL 307 – TAP Workshop in Prior 3 Years a. This proposal makes this new element a requirement for WIOA Youth. We do not see this as a productive use of staff resources as very few youth participants fall into this category.	The Department agrees with the commenter and has removed this requirement from the WIOA Youth column.	1
34.	PIRL 310 – Homeless Veterans' Reintegration Program Grantee a. This element is required for Reportable Individuals, Wagner-Peyser, JVSG, WIOA Adult, DW and WIOA Youth. However, the related PIRL elements 311 through 314 are only required for Wagner-Peyser and JVSG. It seems reasonable to collect this data for Reportable Individuals, Wagner-Peyser and Jobs for Veterans Grant but not for Title 1 programs.	The Department is removing PIRL 310 as a requirement for Reportable Individuals. However, it will remain a requirement for all other participants/programs indicated. Per TEGL 04-16 and VPL 03-16, HVRP grantees are required to enroll their participants in either a WIOA title I, title III, or JVSG workforce program. HVRP grantee staff is required to be present when a veteran is enrolling into a workforce program at an AJC and will provide the 5-digit grant number.	1
35.	PIRL 401 – UC Eligible Status a. The State would appreciate clarification as to the impact of the removal of the word “monetarily”. The State would also appreciate clarification as to why Code 5 has changed to “Exempt” from “Claimant exempt from work search”. Clarification may require the State to change its MIS system.	a. The word “monetarily” was removed from PIRL 401 to ensure that only UI claims where a participant is eligible to receive benefits would be captured in the data. This is due to the fact that a participant can meet the monetary requirements of a UI claim, yet not be deemed eligible to receive benefits due to a non-monetary restriction. Upcoming guidance will address the work search exemption issue.	1
36.	PIRL 411 – Most Recent Date of Qualifying Separation a. The State would appreciate clarification as to why this element would be required by Wagner-Peyser. This element is currently captured by Trade Act staff. The definition of this element falls under the Trade Act program and thus should not be required	The Department agrees and removed PIRL 411 as a requirement for Wagner-Peyser.	1

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37.	PIRL 603 - Supplemental Nutrition Program (SNAP) a. Does making this a required element mean the State is required to collect this information from everyone who receives a participant-level service? If so, the State sees this as a data collection burden.	Yes. Making PIRL 603 a required data element means that the State is required to collect this information from everyone who receives a participant-level service.	1
38.	PIRL 704 - Foster Care Youth Status a. Does making this a required element mean the State is required to collect this information from everyone who receives a participant-level service? If so, the State sees this as a data collection burden.	The Department has made changes to the specifications to clarify that this element only needs to be collected on individuals that are age 24 or younger at the time of program entry.	1
39.	PIRL 801 - Ex-Offender Status at Program Entry a. Does making this a required element mean the State is required to collect this information from everyone who receives a participant-level service? If so, the State sees this as a data collection burden.	Yes. Making PIRL 801 a required element means that the State is required to collect this information from everyone who receives a participant-level service.	1
40.	PIRL 808 - Migrant and Seasonal Farmworker Status at National Farmworker Jobs Program Entry a. The State would appreciate clarification as to why this element is required for Title 1 and Title 3 programs. The State sees this as a data collection burden for Title 1 and Title 3 programs.	See response for PIRL #14. PIRL 808 satisfies the WIOA migrant and seasonal farmworker barrier to employment requirement. Since it must be collected by WIOA title programs, the Department is not removing this requirement.	1
41.	PIRL 1300 - Received Training (WIOA)	Although Wagner-Peyser cannot provide training, it is valuable to know which co-	1

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	a. Wagner-Peyser staff cannot provide training, so the State does not see the requirement for Wagner-Peyser to populate this element as appropriate.	enrolled participants have received training. The Department will keep this requirement.	
42.	PIRL 1504 – Subsistence While in Training a. It appears this element has been removed, yet the R remains for TAA. Was this a typo error, or is the element required by TAA?	PIRL 1504 is not required for TAA, thus the “R” has been removed.	1
43.	PIRL 1800 – Type of Recognized Credential (WIOA) and 1814 – Date Attained Graduate/Post Graduate Degree (WIOA) a. The element number has a “)” at the end of it – which is presumed to be a typo b. By the removal of code 4 – Graduate/Post Graduate, for participants who received such a certificate are States to use code 7 – Other Recognized Diploma, Degree or Certificate? And when using a code 7, is the State expected to populate 1801 – Date Attained Recognized Credential (WIOA)? c. As other states have mentioned other code values have been renumbered. Furthermore, the data removed is now being captured in a new field, element 1814 – Date Attained Graduate/Post Graduate Degree (WIOA). Both these changes will a burden to the state to change its MIS system.	a. The Department agrees, thus the “)” has been removed per commenter’s suggestion. b. See response for PIRL #8. c. See response for PIRL #2.	1
44.	PIRL - 1814 – Date Attained Graduate/Post Graduate Degree	PIRL 1814 is necessary to allow grantees to report on the training outcomes for	1

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	(WIOA) a. Please clarify why this field is required for Wagner-Peyser. This field is for participants who received their degree after receiving education or training services. Wagner-Peyser does not provide participants education or training services.	Wagner-Peyser participants that are co-enrolled even if they are reporting through WIPS using the Wagner-Peyser schema instead of the full PIRL schema.	
45.	PIRL – 1900 – Youth 2nd Quarter Placement (Title 1) (WIOA) and 1901 – Youth 4th Quarter Placement (Title 1) (WIOA) a. Why were the Unsubsidized Employment, Registered Apprenticeship and Military removed for these two elements?	Code values 1-3 in PIRL 1900 and PIRL 1901 were removed because they were moved to PIRL 1602 and PIRL 1606. For the 2 nd and 4 th quarter youth indicators, unsubsidized employment, registered apprenticeship, and military will now be captured in PIRL 1602 and PIRL 1606, code values 1-3.	1
46.	"Graduate/Post Graduate" under Type of Recognized Credential has been removed; however, data element "Date Attained Graduate/Post Graduate Degree" appears. Why is the collection of date attained required when graduate/post graduate is not an allowable credential?	See response for PIRL #8.	1
47.	Please explain the federal purpose for requiring the collection of Data Elements 204, 205, 206, 207, 208, 209. We are unaware of the utility of collecting this information for federal performance calculations nor how collection can provide value to participants through the career planning/case management process. Guidance on why those elements are collected will assist states in their efforts to collect this data by minimizing the participant's likely resistance to disclosing this information.	Through the creation of WIOA, AJCs are required to change the focus and intention of the service delivery system and their partnerships. The purpose of tracking the elements is to: <ul style="list-style-type: none"> - Identify and establish baseline data that can be used to evaluate progress or lack thereof, in terms of serving people with disabilities and the achievement of goals as it pertains to CIE. - Allow the federal government to learn if a certain combination of services helps obtain the best opportunities for individuals with disabilities to obtain CIE. - Allow the federal government to track which services provided allow for the 	1

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		<p>best chance for individuals with specific disabilities to obtain CIE.</p> <ul style="list-style-type: none"> - AJCs can use the data as a driving factor to make strategic decisions and goals based on the emerging trends found in the data. - Work collectively with all levels of staff to identify additional manners to use the data and share broadly with new and existing stakeholders. - Help clients understand the importance of knowing/disclosing the current services they might be receiving so as to work collaboratively (such as through IRTs) with those agencies so the client can achieve maximum results by leveraging multiple services. - The data will also help front-line staff easily identify potential duplication of services by understanding if clients are receiving services from another entity. 	
48.	Data Element 907: Which value should States report when an individual who received incumbent worker services via Rapid Response Activities?	States should report this individual as a code #1 in Element 907 (or #3 if IWT was partially paid for with local funds) and as code #1 in Element 908. The Department has made changes to code #1 to include statewide rapid response funds.	1
49.	Data Element 923: Is "Criminal Offender" a valid entry for WIOA Title I participants who were concurrently enrolled in the AEFLA program? The Joint Performance Accountability Guidance does not indicate this is an option for Title I programs. We are seeing a rise in the demand for WIOA Title I and III services in correctional institutions to meet Wisconsin's projected worker shortages. Is the federal government's intent for Title I to use the "Institutionalized" Other Reason for Exit, consequentially excluding from measurable skill gains during the exit program year when services are completed and the participant is not yet	While this code may be reported for a title I participant that is co-enrolled in title II, the specifications are written in a manner ensuring that this participant will still be counted in title I outcomes regardless of the exceptions for this code under title II.	1

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	released from the institution?		
50.	Data Element 1800: Although Title I programs do not focus on the attainment of a Graduate Degree, these programs may support participants through dual enrollment that are attending graduate programs funded by other sources such as the Title IV Vocational Rehabilitation program. We believe collection of this type of degree for performance accountability purposes is appropriate and should be reported in Data Elements 1800, 1802 and 1804.	See response for PIRL #8.	1
51.	Data Element 1905: The specification Data Type/Data Length is listed as an IN1. There are reportable options that are two digit numbers. Please change this to IN2.	The Department agrees, and will revise the Data Type/Field Length for PIRL 1905 from "1N1" to "IN2".	1
52.	PIRL 309 - Homeless Veterans' Reintegration Program Participant a. Why is this data element required for Reportable Individuals? To reduce the data collection burden on jobseekers, it is recommended that this requirement be removed for Reportable Individuals.	The Department agrees, and will no longer require PIRL 309 to be collected for Reportable Individuals.	1
53.	PIRL 310 - Homeless Veterans' Reintegration Program Grantee This data element is not appropriate for Reportable Individuals. Individuals accessing the system on their own will not necessarily know their HVRP grant number. Commenter recommends removing the requirement for this data from Reportable Individuals.	The Department agrees, and will no longer require PIRL 310 to be collected for Reportable Individuals.	1
54.	PIRL 411 - Most Recent Date of Qualifying Separation a. Why is this data required for Wagner-Peyser? Only select few	The Department agrees, and will not require PIRL 411to be collected for Wagner-	1

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	Wagner-Peyser staff are trained to conduct TAA eligibility, so the majority would not know that the client has a separation from trade-impacted employment that qualified them to receive benefits and/or services under the Trade Act. To reduce incorrect data, and minimize the data collection burden for Wagner-Peyser staff, Commenter recommends that this data element is not required for Wagner-Peyser.	Peyser.	
55.	PIRL 601 – Exhausting TANF Within 2 Years a. The Wagner-Peyser program is not a case management program, and thus they enroll multiple people daily. Adding this additional data element places a burden on Wagner-Peyser staff to collect additional data prior to providing the client the services they need. Additionally, Wagner-Peyser staff do not have access to TANF records, so the answer to this question may be inconsistent and inaccurate as it would rely on jobseeker self-attestation. To ensure accurate data collection, and reduce the burden on the Wagner-Peyser program, Commenter recommends that this data element be removed as a requirement for Wagner-Peyser.	This element represents a WIOA defined barrier to employment that must be reported on for all of the WIOA core programs so that the data may be disaggregated in accordance with statute. TANF is a required one-stop partner program, as is Wagner-Peyser. The programs are encouraged to work together to share this information whenever possible to ensure consistent data.	1
56.	PIRL 808 – Migrant and Seasonal Farmworker Status at National Farmworker Jobs Program Entry (WIOA sec. 167) a. Why is this data element required for Title I, Title III, DWG and JVSG? These programs do not administer the NFJP program, so it is not appropriate to expect them to capture this information at NFJP program entry. Additionally, the definitions under this data element do not align with PIRL 413, so it would create confusion when trying to determine which MSFW definitions the client meets. Commenter strongly recommends that this data element	See response for PIRL #14.	1

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	be removed from Title III, Title I, DWG and JVSG.		
57.	PIRL 907 – Recipient of Incumbent Worker Training Why is this data element required for Wagner-Peyser and JVSG? These programs do not send participants to Incumbent Worker Training, so it is not appropriate to include it for these programs. Commenter recommends that this data element be removed for Wagner-Peyser and JVSG.	Although Wagner-Peyser and JVSG cannot provide training, it is valuable to know which co-enrolled participants have received training. The Department will keep this requirement.	1
58.	PIRL 909 – Rapid Response (Additional Assistance) Why is this data element required for Wagner-Peyser and JVSG? These programs do not conduct Rapid Response Additional Assistance programs, so it is not appropriate to include it for these programs. Commenter recommends that this data element be removed for Wagner-Peyser and JVSG.	The Department agrees with the commenter and has removed this requirement from the Wagner-Peyser and JVSG columns.	1
59.	PIRL 1101 – Most Recent Date Accessed Self-Service Workforce Information Services Federal Register, Vol. 82, No. 98, Tuesday, May 23, 2017 Docket ID: ETA-2017-0002 Agency: Department of Labor Employment and Training Administration With the removal of “self-service” from the title and description, the data element appears to be the same at data element 1103. Commenter recommends maintain the “self-service” designation, or removing one of the data elements, as there is	See response for PIRL #9.	1

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	no need for two of the same elements.		
60.	PIRL 1300 – Received Training (WIOA) This data element is now required for Wagner-Peyser and JVSG, which do not place participants into training. Please provide clarification around the reporting requirements for these programs related to this data element; i.e. is this just for coenrolled participants?	Although Wagner-Peyser and JVSG cannot provide training, it is valuable to know which co-enrolled participants have received training. The Department will keep this requirement.	1
61.	Under WIA, occupational training under an ITA (WIASRD Item 1223) was coded as “06 Other Occupational Skill Training” in the Type of Training” (WIASRD Item 1209 Type of Training). The DOL PIRL under Column D of Type of Training 1, 2 & 3 (Item 1303, 1310 and 1315) Notes that “Code 6 (Other) should only be used in rare instances where other codes are clearly not appropriate”. If a participant received occupational training through an ITA (PIRL 1319) i.e. CDL, LPN, CNA, how should that participant be coded under Item 1303 Type of Training? Is Code 11, in fact, the code value that should rarely be used and Code 6 should be used for an ITA, or is an ITA not recorded in the Type of Training data element?	The Department agrees with this comment and has made changes to the type of training data elements in response to this and similar comments that were made on the WIOA Joint Performance ICR.	1
62.	A self-directed job search is inherently a self-service and should be utilized in the determination of whether a person is a reportable individual. However, based on a review of the PIRL data element definitions and supplemental information created by ETA on understanding reportable individuals and participants,	See response for PIRL #9.	1

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	a self-directed job search is not recordable in any of the PIRL elements used for this purpose. It appears that PIRL element 1000 - Date of First Basic Career Service (Self-Service) and 1002 - Most Recent Date Received Basic Career Services (Self-Service) would be the only elements applicable to the collection of this information. Therefore, it is our recommendation PIRL definitions and any related guidance be modified to include the recording of a self-directed job search.		
63.	Data element 307, TAP Workshop in 3 Prior years – We question the applicability of this data element, as state workforce program staff no longer provide these services due to the outsourcing of this work by the US Department of Defense.	The Department is maintaining this requirement. The collection of this data element is important in assessing whether more recently separated veterans/transitioning service members have had access to the employment information provided by TAP workshops.	1
64.	Data elements 413, Migrant and Seasonal Farmworker Designation Date element 808, Migrant and Seasonal Farmworker Status at National Farmworker Jobs Program Entry – We appreciate the modifications made to both of these elements, however, the similarity in the elements results in confusion for staff and complicates an already lengthy registration process. Therefore, we request that discussions are held to find a way to marry these two elements into one. We would also like to recommend the removal of the requirement for data element 413 to be reported for all individuals who receive incumbent worker training. The PIRL data element 907 would already be indicating individuals who	See response for PIRL #14.	1

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	received incumbent worker training through the H1B grant, which is solely for the migrant seasonal farmworker population. The gathering of this information from all employers would add an additional and unnecessary burden.		
65.	Data element 907, Received Incumbent Worker Training - We appreciate the inclusion of 'Incumbent Worker' as a program of participation for which data elements are required to be reported, as it clarifies the guidance issued in TEGL 10-16. However, it was noted during our review that the column header, Incumbent Worker (Adult/DW Funded), appears to exclude this reporting requirement for participants who received funding under a National Dislocated Worker Grant (DWG) (WIOA section 170) Statewide Funds or H1B. Therefore, we request clarification on whether this assumption is correct.	This interpretation is correct. The column "Incumbent Worker Adult/DW Funded" is only required for those individuals that receive IWT from Adult/DW funds without becoming a participant. The other examples mentioned (DWG, H-1B) could not provide IWT to someone who was a non-participant and therefore, are not required to meet these reporting requirements.	1
66.	Data element 914, Veteran Program – Per Veterans' Program Letter (VPL) 3-14, Local Veterans employment representatives (LVER) are prohibited from providing intensive services to eligible veterans and eligible spouses to meet their employment needs. With this in mind, the requirement of recording 2 for this data element if the participant received services from a Local Veterans Employment Representative (LVER) appears to be unnecessary. Therefore, we would like to suggest this change not be implemented.	The commenter is correct on the guidance issued in VPL 3-14. However, the Department may elect to issue further guidance on LVER responsibilities in the future, as well as collect data on employer outreach activities through the Effectiveness in Serving Employers indicator.	.11
67.	Data element 1300 – Received Training – The revised PIRL adds the Wagner-Peyser and Jobs for Veterans State Grant programs	Although Wagner-Peyser and JVSG cannot provide training, it is valuable to know which co-enrolled participants have received training. The Department will keep this	1

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	to the list of programs for which this element is required to be reported. This requirement seems to be unnecessary, as these grants do not provide funding for training.	requirement.	
68.	Data element 1800, Type of Recognized Credential #1 - The definition for this element includes masters' degree as an example of a recognized credential. A masters' degree is considered a graduate/post graduate degree. Therefore, the removal of an option for 'Graduate/Post-Graduate' from the code values for this element appears to contradict with the data element definition. This deletion also unfairly limits the ability of states to record all positive outcomes for their participants.	See response for PIRL #8 and PIRL #30.	1
69.	Data elements 1902 through 1908, Educational Functioning Level Post-Test information - Assessments used to evaluate educational functioning level include sub-tests to evaluate an individual's proficiency in several educational areas. Results are provided for each educational area rather than a composite score. The PIRL, however, is limited to the recording of only one set of educational functioning level results. We would like to suggest that the PIRL be expanded to include opportunity to record assessment results for three educational areas, as was done under WIA or the elements be removed all together.	The Department agrees with the commenter and has expanded the PIRL by added the opportunity to record assessment results for three educational areas as suggested by the comment.	1
70.	Data element 1203, Most Recent Date Received Internship or Work Experience Opportunities, Date element 1205, Type of Work Experience	Reporting on these data elements should reflect the services provided to the participants being served by the program. In examples like this, where the State strategy provide certain services with one program and not the other, the State must still report on these elements for all programs, even if the number of participants	1

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	<p>Data element 1206, Date Received Financial Literacy Services</p> <p>Data element 1207, Date Received English as a Second Language Services –</p> <p>TEGL 19-16 indicates that DOL “encourages” states to have ES staff (LX/W-P) provide these individualized career services, but does not require it be done; however, the elements are indicated as required reporting for W-P. Pennsylvania uses W-P for a number of Individualized Career Services such as, specialized assessments, development of an IEP, and counseling. However, in PA, W-P funds are not used to provide/fund the career services that are specified in these data elements, as our instituted referral system to our Title I partners facilitates the venue for customers to receive such services. If Pennsylvania has elected not to spend W-P funds on these specific career services, does that equate to a “not applicable” (specifically for 1205, 1206, and 1207) response because there is no service to document?</p>	<p>receiving specific services is zero for a particular program. States may choose to control the reporting of these elements through their own management information system (MIS) but the data must still be reported to the Department.</p>	
Reportable Individual			
1.	<p>A. Reportable Individual: The new layout requires states to indicate, by title, who is reportable and who is not. Based on services received, programming could be utilized to determine just those who are reportable. All participants were reportable individuals, but all reportable individuals are not participants. Under the new layout, a reportable individual is now required to</p>	<p>The determination of who is a reportable individual for each program will depend on the service delivery strategy being implemented. For example, some States may choose to use only title III funds to provide services to reportable individuals who are not participants. Other States may decide to serve this same group using funds from title I Adult, title I Dislocated Worker, and title III Wagner-Peyser. The program that</p>	1

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	<p>list by program format, however each program is required to indicate if reportable for that program. The reportable individuals can be calculated by service fields already reported. Is the intent to treat programs as separate entities or to increase funding linkages and co-enrollment? If an Adult and a Dislocated Worker, if Adult funds orientation and Dislocated funds all other services, the individual is listed as a participant for Adult and DW currently. In this example, based on ICR proposed reporting, would Adult be just reportable only while Dislocated Worker is a participant?</p> <p>B. PIRL 903 - Adult (WIOA), 904 - Dislocated Worker (WIOA), 905 - Youth (WIOA), 918 - Wagner-Peyser Employment Service (WIOA) - Value 4 - Reportable Individual How is a state to determine whether a person "has demonstrated an intent to use program services"? Does this mean a person has demonstrated an intent to use Youth services versus demonstrated an intent to use Adult or Dislocated Worker services? We are not seeing how a state can determine a reportable individual's intent. If the state determines a person meets one of the criteria for A or B, how is a state to determine which data element - 903, 904, 905 or 918 should be populated? PIRL 913 - Adult (WIOA)</p> <p>C. Seeking clarification on the appropriate circumstance to record "Reportable Individual" for this data element. For States with multiple programs utilizing the same MIS system, the</p>	<p>reportable individuals are reported under should be reflective of this strategy.</p>	

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	<p>requirement to report a funding stream for reportable individual poses a problem as program applications/eligibility are not required to provide reportable services. Please provide clarification on when to report an Adult as reportable only.</p> <p>D. PIRL 904 - Dislocated Worker (WIOA) Seeking clarification on the appropriate circumstance to record "Reportable Individual" for this data element. For States with multiple programs utilizing the same MIS system, the requirement to report a funding stream for reportable individual poses a problem as program applications/eligibility are not required to provide reportable services. Please provide clarification on when to report a Dislocated Worker as reportable only.</p> <p>E. Data elements 903, 904, 905, and 918, Adult, Dislocated Worker, Youth, Wagner-Peyser - We have grave concerns regarding the suggested changes to the way in which reportable individuals are captured and reported. To be connected to the Adult, Dislocated Worker or Youth programs, eligibility must be established and a staff-assisted service provided. To be considered a Wagner-Peyser participant, a staff-assisted service must be provided. Prior to this occurring, the individual is considered to be expressing interest in receiving any and all available workforce services. Therefore, the attempt to codify whether a reportable individual is part of any specific program seems to be a contradiction to the purpose of making a distinction between reportable individuals only and those who</p>		

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	move on to become program participants. It is for this reason we request the definition of these elements revert to what was originally provided in June 2016.		
2.	<p>A. #903: Adult (WIOA)</p> <p>The change to add 4. Reportable Individual is confusing. The first confusing part is how to determine if someone has demonstrated an intent to use Adult services when they are only receiving self-service or informational services only. The second confusing part of this change is if we are able to determine if a Reportable Individual has demonstrated an intent to receive Adult services, why is there not an “R” in the Reportable Individual column?</p> <p>B. #904: Dislocated Worker (WIOA)</p> <p>Same comment as #903.</p> <p>The change to add 4. Reportable Individual is confusing. The first confusing part is how to determine if someone has demonstrated an intent to use Dislocated Worker services when they are only receiving self-service or informational services only. The second confusing part of this change is if we are able to determine if a Reportable Individual has demonstrated an intent to receive Dislocated Worker services, why is there not an “R” in the Reportable Individual column?</p> <p>C. #918: Wagner-Peyser Employment Service (WIOA)</p>	See responses for PIRL #3 and Reportable Individual #1.	1

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	Demonstrating an intent to use Wagner-Peyser services is a bit easier than determining if someone has demonstrated an intent to use Adult or Dislocated Worker services, however there is still the question of why is this not reportable for a Reportable Individual (an “R” in the Reportable Individual column)?		
3.	#905, 918 They have added an additional value for Reportable Individual to these columns. That does not make sense since this is not a required field for reportable individuals. When would we ever report this value?	See response for PIRL #3.	1
4.	The addition of the IWT program column a. Incumbent Worker Training may or may not produce a recognized credential, or a measurable skill gains. Why is this data required for an Incumbent Worker if they are not participants in the program? b. TEGL 10-16 indicates that certain information is required for IWT participants including demographic information. The IWT column in the PIRL does not include an “R” for most of the demographic data elements. It appears that the IWT requirements in the PIRL may be incomplete. c. The performance data elements that are required for IWT rely on an exit date for calculations, but the PIRL data element 901 – Date of Exit is not required for IWT.	a. – The commenter is correct that IWT may not always lead to a credential, but information about outcomes like credentials and measurable skill gains provide useful information for understanding IWT and its effectiveness. b. and c. – The Department has published Change 1, TEGL 10-16 to correct this issue so that the guidance aligns with this ICR.	1
5.	PIRL 302 – Campaign Veteran a. Why is this data element being added for the Youth program, but no other Title I programs? Per the most recent schema changes, this data element is also required for Adult and DW. To	The Department agrees with the commenter and has removed this requirement from the WIOA Youth column.	1

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	ensure consistency across documents and programs, Commenter recommends that this data element either be removed from all Title I programs, or added to all Title I programs.		
6.	<p>PIRL 1814 – Date Attained Graduate/Post Graduate Degree (WIOA)</p> <p>a. Why has this data element been separated out from PIRL 1800, 1802 and 1804? The date was being captured in 1801, 1803 and 1805, so it seems unnecessary to create a new line item. Additionally, based on the report specifications, Title I would not receive a positive in the Credential Attainment measure if a participant is coded under 1814. Commenter recommends removing PIRL 1814 and keeping the data in 1800-1805.</p>	See response for PIRL #8.	1
7.	<p>Code value 4 and Code 2 for WP = Reportable Individual has been added to Adult, DW, Youth, and Wagner-Peyser (Data items 303, 304, 305 and 318). These new coding requirements raise questions concerning how co-enrolled individuals should/could be counted or not counted in performance indicators. Please clarify if the following scenarios of co-enrollment are allowable and how performance and “counts” of reportable individuals should be recorded:</p> <ul style="list-style-type: none"> • Within Title I, an individual is co-enrolled in adult & dislocated program with adult coded as a 4 and dislocated coded as a 1. Do they only count in the Dislocated Performance Indicators and as Reportable Adult? • Within Title I, an individual in co-enrolled in the adult & youth program with adult coded as a 4 and youth coded as a 1. Do they only count in the Youth Performance Indicators and as a 	In general, reportable individuals should be reported as described in the response to the comment in Reportable Individual #1. Depending on a State’s service strategy and common exit policy, a reportable individual that becomes a participant may become a participant in multiple programs. If, however, the individual is a participant in one or more program(s) and a reportable individual in another, their performance outcomes will only be counted towards the program(s) in which they are participants. The individual is only considered “co-enrolled” when they become a participant in more than one program.	1

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	Reportable adult? <ul style="list-style-type: none"> An individual is co-enrolled in adult Title I coded as 4 and Wagner-Peyser Title 3 coded as a 1. Do they only count in the Title III Performance Indicators and again counted as a Reportable Title I adult? 		
8.	Item A.3, Reportable Individual – The revised specification for the calculation of this data point relies only on whether an individual is marked as being a reportable individual in any of the funding stream elements; however, due to our earlier concerns with that process, we do not feel it is appropriate for the specification to rely on this criterion. We therefore recommend reverting to the original specification.	See response for PIRL #4.	1
Program Report Specs			
1.	Item 2. When calculating all Basic Career Services and Total Career Service measures on ETA-9173 WIOA Quarterly Report, the previous specifications had included PIRL data element # 1000 Date of First Basic Career Service (Self-Service), and the proposed changes use data element #1002 Most Recent Date Received Basic Career Services (Self-Service) instead. This change doesn't seem necessary. The current specification for measures in the ETA-9173 WIOA Quarterly Report only verified that PIRL data element # 1000 – Date of First Basic Career Service (Self-Service) is not null. Likewise, the proposed specification for measures in the ETA-9173 WIOA Quarterly Report only verified that PIRL data element # 1002 – Most recent Date Received Basic Career Services (Self-Service) is not null.	The commenter is correct. The Department's proposed changes will not affect the outcome of the calculation. Therefore, the Department has revised this set of specifications to reference "Date of First Basic Career Service (Self-Service)" again.	1

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	When a date is required to be populated in these fields, both PIRL data elements # 1000 and # 1002 will contain a date value within any particular record. In other words, the specification only verifies that the PIRL data element, referenced above, is not null. Both data elements will contain a value, and the exact date –whether the measure uses the first or most recent date—is not relevant to this calculation. Therefore, this change does not affect the outcome of the calculation. What was the purpose of this proposed change?		
2.	<p>Item 4. The ETA-9173 WIOA Quarterly Report performance measure specifications contain errors, as follows:</p> <p>D.4 Credential Rate – The greater than or equal to (i.e. >=0) clause in the numerator is incorrect. The numerator criteria includes: “Employed 1st Quarter after exit >=0 and <9, or Employed 2nd Quarter after exit >=0 and <9, or Employed 3rd Quarter after exit >=0 and <9, or Employed 4th Quarter after exit >=0 and <9”. For the PIRL data elements corresponding to above specifications, the correct values are greater than zero (>0) and not greater than or equal to (>=0). In these data elements, ‘0’ is code for Not Employed, and is not to be included in the Credential Rate numerator.</p> <p>D.5 Measurable Skill Gains – The specification for calculating all Measurable Skill Gain metrics (Individualized Career Services, Training Services, and Total Current Period) are EXACTLY the same. Their criteria cannot be the same because they reflect different cohorts and are therefore incorrect. The correct specification would require the criteria for Individualized Career Services to be different from that of Training Services.</p>	<p>D.4: The Department agrees with the commenter and has revised the Credential Rate specification to > 0.</p> <p>D.5: The Department agrees with the commenter and has revised the Measurable Skill Gains specifications accordingly.</p>	1

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	Alternatively, if the specifications are not changed, the Individualized Career Services and Training Services measures could be removed, and Measurable Skill Gains would only be calculated for the Total Current Period		
3.	<p>8) Quarterly Report Spec 36</p> <p>While the specifications for “Total Covered Entrants Who Reached the End of the Entry Period” is fairly 37 clear, it is not aligned with the label. As written, the specification will deliver the total number of Covered 38 Person Entrants, not the Number of Covered Person Entrants who were not served within 45 Days, 39 which seems to be the intent of the element. We recommend either changing the label to reference 40 “Total Covered Person Entrants” or rewrite the specification to the following: 41</p> <p>Count of Unique RECORDs where ((Funding Stream) and (ELIGIBLE VETERAN > 0 and 42 COVERED PERSON ENTRY DATE+45 Days is within the reporting period) and (Date of First Basic 43</p> <p>5</p> <p>Career Service (Self-Service) is (null or > COVERED PERSON ENTRY DATE +45 Days)) or (Date 1 of Program Entry (WIOA) is (null or > COVERED PERSON ENTRY DATE + 45 Days))</p>	The commenter is mistaken about the intent of the data element. The intent for this measure is to collect what amounts to the denominator for the percentages calculated in E2 and E3, and therefore is meant to include both--those that received and did not receive services in the first 45 days.	1
4.	The Graduate/post graduate was removed from the code values for elements 1800, 1802, and 1804 but it is still referred to in the data element definitions. Utah recommends counting graduate/post graduate level certificates as credential attainment.	The commenter is correct. The data element definitions from PIRL 1800, 1802, and 1804 should not mention graduate/post graduate degrees as they are no longer included in the data elements. They were removed because WIOA does not allow graduate/post graduate degrees to count in the credential attainment indicator for titles I and III.	1

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5.	#808: Migrant and Seasonal Farmworker Status at National Farmworker Jobs Program Entry We do not understand why this change is taking place. We are reporting all the information necessary to convert the old values to the new ones.	PIRL 808, Migrant and Seasonal Farmworker Status, meets the requirements set forth in WIOA Sec. 167. As such the Department is using this data element when determining migrant and seasonal farmworker counts for quarterly and annual reporting. The Department has renamed PIRL 808 to clarify that it is not NFJP specific.	
6.	The Adult and Dislocated Worker Program Credential Attainment Rate calculation includes in its denominator participants that have "Participated in Postsecondary Education During Program Participation" or were "Enrolled in Secondary Education Program". The Joint Performance Accountability Guidance suggests enrollment in non-WIOA funded education is not included in the calculation of the Credential Attainment Rate's denominator for the Adult and Dislocated Worker Program. <ul style="list-style-type: none"> • "All Adult program participants who received training that was not OJT or Customized Training are included in the credential attainment indicator." • "All Dislocated Worker program participants who received training that was not OJT or Customized Training are included in the credential attainment indicator." We believe the report template reflects the Youth Program's Credential Attainment Rate calculation that includes all In-School Youth in the indicator's denominator. Should an Adult or Dislocated Worker participant who was in secondary or postsecondary education not funded by these programs at program entry be included in the Credential Attainment Rate?	The calculation for the Credential Attainment rate will not be changed. However, the Department clarifies that States should report on their programs' provision of education and training as defined by the program of participation specified in Change 1, TEGL 10-16.	1
7.	1. Field Label B.3d: Unemployed Individuals a. Why is "not in labor force" included in this line item? Including	The Department agrees with the comments and has modified the PIRL and Specifications accordingly.	

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	“not in labor force” data in this line item skews the data, as these individuals may not be looking for employment. Commenter suggests removing “not in labor force” from this line item calculation.	Report specifications have been revised to include only those unemployed or employed, but received notice of termination.	
8.	Field Label D.5: Measurable Skill Gains a. Why is Other Reason for Exit = 007 included in the Measurable Skill Gains calculation for WIOA Adult/Dislocated Worker? Per TEGL 10-16, Criminal Offender takes a WIOA Youth out of the MSG denominator. This should only be included for Title II. b. The specifications in each column for MSG line item are identical. Please update the specification to ensure the data matches the report headers.	a. This is consistent with the Measurable Skill Gains specification for the annual report. The commenter is correct, 07 is not an allowable code value for titles I and III, but the Department will not change the specification in order to keep them consistent across reports. Instead, code value 07 will be rejected by edit checks within the WIPS reporting system. b. See response to Program Report Specs Comment # 2.	1
9.	PIRL 2003 – DWG Grant Number a. The code value does not match the edit checks that were implanted for WIPS. Please correct.	The code value for PIRL 2003 has been changed to include only the first seven characters of the grant number. The reporting system will be aligned with this version of PIRL 2003 as soon as possible.	1
10.	The PIRL Spec named ETA-2017-0002-0003_MEAUSRES_AND_REPORTS was published to https://www.regulations.gov/docket?D=ETA-2017-0002 on 5/24/2017 with 3 new indicators that we would like clarified. The indicators regarding covered entrants have their logic spelled out, however we are not clear on the cohorts. For example, the Employment Q2 measure is reported 4 quarters after exit and the Employment Q4 measure is reported 6 quarters after exit – but during which reporting period are the new covered entrant indicators reported? And to clarify, are these exiters only?	This cohort is those participants with a “covered person entry date” within the reporting period.	1
11.	Item D.4, Credential Rate - The removal of ‘Graduate/Post-Graduate’ as a viable code value for the ‘type of recognized	See response for PIRL #8.	1

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	credential' data elements eliminates the ability of Title 1 programs from achieving positive outcomes for this measure for participants who complete a masters' degree program, unless the participant is also receiving services from a Title IV program.		
12.	Many of the detailed specifications include a proposed change from the 'Date of First Basic Career Service' to 'Most Recent Date Received Basic Career Services'. While we recognize this change should have no impact on results, it does require significant programming changes to those states who are developing customized reports for program administrators at all levels. Therefore, we respectfully request that these changes be reverted back to 'Date of First Basic Career Service'.	See response for Program Report Specs # 1.	1
TEGL 10-16 References			
1.	4.PIRL Elements 1703 - 1706--Requesting clarification between TEGL 10-16 and TEGL 26-16. Attachment 3, Wage Conversion Chart of TEGL 10-16 shows how to convert an hourly, weekly, biweekly, monthly and annual wage to quarterly wages. Our interpretation is that, for example, if the participant is receiving an hourly wage, no matter how many weeks the participant actually works within the quarter, the calculation is hourly wage X average hours per week X 13 weeks becomes the result for the participant. TEGL 26-16, Page 7 states in #5.iv, "For States that elect to use supplemental wage information, States must ensure that a participant's quarterly earnings used for reporting the median earnings indicator (second quarter after exit) only reflect those wages that are actually paid to the participant during the	The Wage Conversion Chart should not be used to overstate a participant's wages. It should be used as a guide to calculate wages using all of the information available. If you know the hourly wage and how many hours the participant worked in the quarter, then you should use all of that information as outlined in the chart to approximate their wages.	1

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	quarter." In the case of a participant only working part of the quarter, the conversion chart would overstate the participant's wages for the quarter. This statement seems to contradict the conversion chart which appears to be more of a standard calculation rather than an actual and TEGL 26-16 implies "actually paid to the participant".		
2.	<ul style="list-style-type: none"> Incumbent Worker reporting: The intent was to increase the number of fields for incumbent worker reporting. Under this new ICR, demographic data fields has been removed. Was this an oversight? <p>The PIRL document seems incomplete: TEGL 10-16 stated that Incumbent Worker is to collect demographic data and barrier data but none of the PIRL items are listed as required for Incumbent Workers in this ICR. There are data elements related to employment after exit, but there is no requirement to report an exit date. In addition, TEGL 10-16 requires for Incumbent Workers that their exit date is not as defined for PIRL, it is the Training Contract end date. As systems need to be modified it is imperative that complete documentation is provided for planning purposes to accommodate system modifications needed. Having incomplete documentation associated to this Federal Register causes an undue burden. Incumbent workers typically are receiving training of some type, but why are PIRL items 1300 through 1318 not required for training, especially if Credentials and Measureable Skills gains are reportable for Incumbent Workers? Was this an oversight?</p>	The Department has published Change 1 to TEGL 10-16 to correct this issue so that the guidance aligns with this ICR.	1
3.	Item 1. The proposed changes include making PIRL data element 413 - Migrant and Seasonal Farmworker Designation (Wagner-	See response for PIRL #14.	

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	<p>Peyser) a required field for WIOA Adults, WIOA Dislocated Workers and WIOA Youth. The name of PIRL data element number 413 - would also be changed from Seasonal Farmworker Designation (Wagner-Peyser) to Migrant and Seasonal Farmworker Designation.</p> <p>PIRL data element 413 - Migrant and Seasonal Farmworker Designation (Wagner-Peyser) was included in the specification for calculating ETA-9173 WIOA Quarterly Report measure C.8 - Eligible migrant and seasonal farmworkers for WIOA Adults, Dislocated Workers and Youth. The proposed ETA-9173 WIOA Quarterly Report measure C.8 - Eligible migrant and seasonal farmworkers specification, however, excluded PIRL element # 413 Migrant and Seasonal Farmworker Designation.</p> <p>If PIRL data element 413 - Migrant and Seasonal Farmworker Designation is not to be used for calculating measure C.8 - Eligible migrant and seasonal farmworkers for WIOA Adults, Dislocated Workers and Youth anymore, then what is the purpose of requiring PIRL data element 413 to be populated for WIOA Adults, WIOA Dislocated Workers and WIOA Youth? On the other hand, if PIRL data element 413 - Migrant and Seasonal Farmworker Designation was intended to be a required field for WIOA Adults, Dislocated Worker and Youth, then why is it not to be used for calculating measure C.8 - Eligible migrant and seasonal farmworkers for WIOA Adults, Dislocated Workers and Youth anymore?</p>		

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WIOA Youth			
1.	<p>5) Date of First WIOA Youth Service and Date of Program Entry are not well aligned 1 The Date of Program Entry is the date on which a person became a Participant under §677.150, while 2 the Date of First WIOA Youth Service is listed as “the date on which the participant began receiving 3 his/her first service funded by the WIOA Youth program following a determination of eligibility to 4 participate in the program.” 5 Under §677.150, a person becomes a Youth Program Participant after: 6 a) Determination of Eligibility; 7 b) Completion of an Objective Assessment; 8 c) Development of an Individual Service Strategy; AND, 9 d) Provision of one of the 14 WIOA Youth elements from WIOA §129(c)(2). 10 The issue is that these four elements might not all be provided on the same day. For example, if a 11 youth was determined eligible and received their assessment and service strategy on 2/1/18 and then 12 received their first WIOA Youth element on 2/8/18, then the Date of First Youth Service would be 2/1/18 13 (the date of the first Youth-funded service), while the Date of Program Entry would be the 2/8/18 (the 14 date the required 4th Youth Participation element was met). 15 If DOL is comfortable with the Date of First Youth service being reported outside of a POP, such as in 16 the above example,</p>	<p>The Department agrees with the commenter’s recommendation and has changed the data element definition for PIRL 906 - Date of First Youth Service to read “Record the date on which the participant began receiving his/her first WIOA youth service (i.e., 1 of the 14 youth program elements in WIOA §129(c)(2)). Leave blank if the participant did not receive services funded by the WIOA Youth program.”</p>	1

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	<p>then the PIRL elements are fine. However, if DOL envisioned the Date of First 17 WIOA Youth Service always being within a POP, then we recommend that the definition be modified to 18 read:</p> <p>19 Record the date on which the participant became a Youth Participant in accordance with 20 CFR 20 677.150. This date will either match the Date of Program Entry for a Participant whose program was 21 Youth or will be later than the Date of Program Entry if the individual began their Period of 22 Participation in another program.</p>		
2.	<p>7) Location of Elements 1902-1908 31 These elements are in the “Additional Youth Related Outcome Data” section of the DOL PIRL even 32 though they don’t just apply to Title I Youth or Youth-focused programs. These elements should be 33 moved to the 1800 Series with the other Education and Credential Related data. Or the current section 34 could be renamed “Other Education-Related Outcome Data.”</p>	<p>The Department agrees with the commenter and has renamed the 1900 section “Additional Outcome Data”.</p>	1
3.	<p>Field Label B.3d: Unemployed Individuals a. Why is “not in labor force” included in this line item? Including “not in labor force” data in this line item skews the data, as youth may not be looking for employment. Commenter suggests removing “not in labor force” from this line item.</p>	<p>The Department agrees with this comment and has revised the specifications accordingly.</p>	1
4.	<p>Field Label D.5: Measurable Skill Gains a. Why is Other Reason for Exit = 007 included in the Measurable Skill Gains calculation for WIOA Youth? Per TEGL 10-16, Criminal Offender takes a WIOA Youth out of the MSG denominator. This should only be included for Title II. b. The specifications in each column for MSG line item are</p>	<p>a. See response for Program Report Specs #8. b. The Department agrees with the commenter. The Measureable Skill Gains specifications have all been revised to include conditions for each type of service.</p>	1

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	identical. Please update the specification to ensure the data matches the report headers.		
5.	<p>PIRL 307 – TAP Workshop in 3 Prior Years</p> <p>a. This was removed from the LERS, but is now being brought back. To reduce the data collection for Wagner-Peyser staff, commenter recommends that this data element be removed.</p> <p>b. Why is this data element being added for the Youth program, but no other Title I programs? To decrease the data collection on staff, commenter recommends that this data element be removed as a requirement for youth.</p>	<p>a. The collection of this data element is important in assessing whether more recently separated veterans/transitioning service members have had access to the employment information provided by TAP workshops.</p> <p>b. The Department agrees with the comment and has removed it for WIOA youth.</p>	1
SCSEP			
1.	<p>1)The Program Performance Report Template proposed would be an inadequate replacement of the currently used SCSEP Quarterly Progress Report (QPR), which is the key management report used by SCSEP grantees. Some observations about this revision:</p> <p>The Program Performance Report does not reflect key pieces of data that measure the community service impact of the SCSEP. For instance, the number of hours worked in service to the general community, to the elderly community, etc., are absent from this report. By ceasing to report this information, the document ignores half of SCSEP's dual-purpose mission, which is 1) to provide jobs training and 2) to provide community service. The proposed report template omits certain information that has practical utility to SCSEP program management including:</p> <ul style="list-style-type: none"> oSeveral barriers such as: Residence in a Rural Area, Age 75+, At 	<p>The PIRL captures data elements that generate the outcomes for the SCSEP's indicators of performance (Older Americans Act (OAA) Section 513(b)). In addition, the Department plans to continue and make available reports such as the comparison of goal against current actual performance in the QPR and through the InfoSPACE system. InfoSPACE provides advanced query and analysis functions using record level data.</p> <p>PIRL 2832-2839 contains the Community Service Performance indicator. PIRL 200, 800, 2800, 2804, and 2810-2821 contain information for the Most-in-Need Waiver Factors. These elements can be found within the DOL PIRL Amended Document.</p> <p>The Department is currently reviewing its approach for measuring the Effectiveness of Serving Employers, Host Agencies and Participant's performance indicator. The Department is investigating approaches that are not onerous and will gather quality feedback to improve service delivery to employers, host agencies and participants.</p>	1

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	<p>Risk of Homeless, Frailty, Severely Limited Employment Prospects, etc. (yet these are required data points in the PIRL report)</p> <ul style="list-style-type: none"> oTotal hours paid (also a required data point in the PIRL report) oAverage project duration oEmployment data such as average wage, benefits, etc. <p>oThe new format does not allow for the comparison of goals against current actual performance, which is one of the most useful functions of the report and one that should not be eliminated.</p> <p>The list of performance measures is incomplete on this report. The "Effectiveness in serving Employers" measure and the "Community Service Hours" measure are omitted, although they appear in the 2016 OAA Reauthorization.</p>	<p>The Department agrees with the commenter and has removed the following as SCSEP required data elements: 407, 803, 924, 933, 1214, 1329, 1407, 2227, 2232, 2400, 2429, 2430, 2517, 2612, 2615, and 2823.</p>	
2.	<p>2)Other comments and questions: SCSEP's unique design provides skills growth opportunities to participants through work-based training assignments. For this reason, the new performance indicator, Credential Rate, has limited relevance to SCSEP. As well, because this measure tracks credentials obtained up to 1 year after exit, this will add an additional burden to our performance of routine follow-up, which is already one of the most difficult elements of administering the SCSEP.</p> <p>Clarification is needed on what information flows into this report. Does this report draw only from data reported by the entity running the report? Or, does it draw from data collectively reported by WIOA partners? For instance, if a participant is dual-enrolled with SCSEP and Vocational Rehabilitation (VR), and VR</p>	<p>Recognized Credential Rate, which captures employment outcome in the 1st, 2nd, 3rd, and 4th quarter, is not an indicator of performance mandated for SCSEP. Thus, the Department agrees with the commenter and has removed PIRL data elements 1601, 1605, 1614, 1616, 1703, and 1705 as requirements for SCSEP collection, which support the Credential Rate calculation. The Department will however, capture data elements supporting credential attainment (such as Secondary School Diploma/or Equivalency and Occupational Certificate) for SCSEP to track the effectiveness of participants receiving skill training under Additional Training and Supportive Services (ATSS) that obtained an industry-recognized credential and entered into employment. As well, the data elements supporting credential attainment will be calculated using data in each file submitted. At no point will information collected by VR, be merged with another grantee's file to generate a report. If a participant is co-enrolled in SCSEP and VR, it is the responsibility of both grantees to report the credential earned if it is going to be reported in their individual reports.</p>	1

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	<p>inputs into the system that a participant has earned a credential, is that credential then reflected on a report run by SCSEP? How is credit for the credential distributed among the different programs? Which partner enters which information? In the Program Performance Report, what does "Program to Date" refer to? Is this equivalent to "program year to date", or a longer period?</p> <p>According to TEGL 26-16, the performance measure on Employment is based on the second and fourth quarters after exit, while the Earnings measure is based on the second quarter after exit. Why then are we asked to report employment in the first quarter after exit? (#1600 in the PIRL, page 54)</p> <p>We are concerned about the data elements that SCSEP is required to report, but that do not apply to SCSEP (for instance, the elements in PIRL section E.02 regarding H1B training and underemployment).</p>	<p>The "program year to date" element in the QPR is synonymous with "program to date".</p> <p>It is not the Department's intention to require grantees to report items that are not relevant to SCSEP. The Department's goal is to increase alignment with WIOA by using common data collection and reporting, while at the same time preserving the unique aspects of the SCSEP by continuing the QPR and other SCSEP-specific reports that do not impose any additional reporting burden on grantees.</p>	
3.	<p>SCSEP is now added to the layout for reporting. Given the recent federal government budget plan, should this be placed on hold until it is known if SCSEP will be funded next year? It takes significant time to create the related data extracts and field order. If states must now change the order only to later remove several columns because of budget constraints, this situation will create an unnecessary burden on states.</p>	<p>The Department integrated SCSEP into this information collection in order to comply with the OAA Reauthorization Act of 2016 requirement to implement the core indicators of performance no later than December 31, 2017, and to streamline ETA-wide performance reporting. The initial implementation of the new performance measures will be done in the current reporting system and will require no additional data collection. Any additional fields will be added through the Modernization process.</p>	1
4.	<p>#2800 – 2847 SCSEP Fields: This is a big problem for Montana. In addition to these 48 fields a bunch of existing columns are required for SCSEP. This includes columns in odd places like Youthbuild and Reentry Employment</p>	<p>In an effort to streamline ETA-wide performance reporting and comply with the requirement of implementing the core measures of performance no later than December 31, 2017, the Department added SCSEP to this performance information collection. In addition, SCSEP will be a part of the case management system that will</p>	1

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	<p>Opportunities (formally Reintegration of Ex Offenders). Currently in Montana, SCSEP is run by a private organization. We believe they currently only report to us a limited set of aggregated data. We have had data integrity issues with the little they do report. To correctly report SCSEP data we would have to at a minimum match clients across systems, get Experience Works to collect this information, create a way for them to transfer that data, and update our MIS system to store the data. The cost to the State of Montana to make these changes to reporting is estimated at \$100,488.</p>	<p>facilitate easier collections and reporting of the information.</p> <p>In order to avoid creating duplicative data elements, SCSEP -used existing PIRL data elements. To correctly report SCSEP data, grantees will not need to match SCSEP data across multiple data systems. It is not the Department's intention to require grantees to report items that are not relevant to SCSEP. Including SCSEP in the PIRL provides a vehicle to collect related data that SCSEP requires without separate OMB approval.</p>	
5.	<p>The Program Performance Report Template proposed would be an inadequate replacement of the currently used Senior Community Service Employment Program (SCSEP)'s Quarterly Progress Report (QPR), which is the key management report used by SCSEP grantees. Some observations about this revision:</p> <ul style="list-style-type: none"> • The Program Performance Report does not reflect key pieces of data that measure the community service impact of the SCSEP. For instance, the number of hours worked in service to the general community, to the elderly community, etc., are absent from this report. By ceasing to report this information, the document ignores a significant aspect of SCSEP's multiple missions which include: 1) fostering self-sufficiency through unsubsidized employment; and providing part-time community service work-based training which enhances the services community service public and non-profit agencies are able to provide locally. 	<p>The Department used the PIRL information collection for OMB approval of data elements similar to those collected by WIOA, and will submit a supplemental OMB information collection for case management elements unique to SCSEP. The PIRL captures data elements that impact and/or relate to activities for the SCSEP Indicators of Performance (OAA Section 513(b)).</p> <p>Any elements outside of the scope of this information collection will be maintained in the ETA Case Management Record Layout. This includes current SCSEP additional elements that impact the Community Service Assignments performance indicator.</p>	1
6.	<p>The proposed report template also omits certain information that has practical utility to SCSEP program management</p>	<p>See response for SCSEP #1.</p>	1

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	including: o Several barriers such as: Residence in a Rural Area, Age 75+, At Risk of Homeless, Frailty, Severely Limited Employment Prospects, etc. (yet these are required data points in the PIRL report) o Total hours paid (also a required data point in the PIRL report) o Average project duration o Employment data such as average wage, benefits, etc. Additionally, the new format does not allow for the comparison of goals against current actual performance, which is one of the most useful functions of the report and one that should not be eliminated. Lastly, the list of performance measures is incomplete on this report. The “Effectiveness in serving Employers” measure and the “Community Service Hours” measure are omitted, although they appear in the 2016 OAA Reauthorization.		
7.	SCSEP’s unique design provides skills growth opportunities to participants through work-based training assignments. For this reason, the new performance indicator, Credential Rate, has limited relevance to SCSEP and is not one of the SCSEP performance measures in the Older Americans Act Reauthorization of 2016. As well, because this measure tracks credentials obtained up to 1 year after exit, this will add an additional burden to our performance of routine follow-up, which is already one of the most difficult elements of administering the SCSEP.	See response for SCSEP #2.	1
8.	Clarification is needed on what information flows into this report. Does this report draw only from data reported by the entity running the report? Or, does it draw from data collectively reported by WIOA partners? For instance, if a participant is dual-enrolled with SCSEP and Vocational Rehabilitation (VR), and VR	The report is calculated using data in each file submitted. At no point will information collected by VR, be merged with another grantee’s file to generate a report. If a participant is co-enrolled in SCSEP and VR, it is the responsibility of both grantees to report the credential earned if it is reported in their individual reports.	1

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	inputs into the system that a participant has earned a credential, is that credential then reflected on a report run by SCSEP? How is credit for the credential distributed among the different programs? Which partner enters which information?		
9.	In the Program Performance Report, what does “Program to Date” refer to? Is this equivalent to “program year to date”, or a longer period?	The “program year to date” element in the Quarterly Performance Report (QPR) is synonymous with “program to date”.	1
10.	According to TEGL 26-16, the performance measure on Employment is based on the second and fourth quarters after exit, while the Earnings measure is based on the second quarter after exit. Why then are we asked to report employment in the first quarter after exit? (#1600 in the PIRL, page 54)	See response for SCSEP #2.	1
11.	We are concerned about the data elements that SCSEP is required to report, but that do not apply to SCSEP (for instance, the elements in PIRL section E.02 regarding H1B training and underemployment).	See response for SCSEP #1.	1
NFJP			
1.	PIRL data elements 2220, 2221, 2219, 2217, 2218 related to number of hours of training provided. Comment: <ul style="list-style-type: none"> Currently, these data elements only can accept data that is three integers in length, therefore the number of hours of the grantees may report is restricted to 999. Participants may train more than 999 hours, and that data currently cannot be captured. We recommend adjusting these data elements to be able to accept at least four integers. 	The Department concurs and has expanded the field length of PIRL 2217 – 2221 to accept at least four integers.	1

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2.	Field Label C.8: Eligible migrant and seasonal farmworkers a. Why are we utilizing the WIOA sec 167 definition for all programs? The NFJP program serves a small percentage of WIOA participants, so Commenter recommends that the calculation for this line item be changed to include PIRL data element 413 – Migrant Seasonal Farmworker Designation.	<p>WIOA programs are reporting on PIRL 808 to track eligible migrant and seasonal farmworkers, as defined in section 167(i) which is listed as individuals with barriers to employment as defined under WIOA Section 3(24) j</p> <p>States have a responsibility under Wagner-Peyser Act regulations to provide employment services, benefits, and protections to migrant and seasonal farmworkers (MSFWs) on a basis that is qualitatively equivalent and quantitatively proportionate to services provided to non-MSFWs. Since Local Employment Services offices must determine whether participants are MSFWs as described at 20 CFR 651.10., PIRL 413 is used for this purpose. These two PIRL data elements are distinct from each other. Other programs, besides Wagner-Peyser and NFJP, track what kind of services the workforce system is providing to MSFWs.</p> <p>The Monitor Advocate System is the method by which the Department, by monitoring established service level indicators, ensures the equitable provision of Wagner-Peyser Employment Services to these two populations (MSFWs and non-MSFWs) of participants in the WIOA title III ES program. These are not for performance accountability purposes.</p>	
3.	Removal of No. 1102-1115 Basic Career Services Comment: Elements 1102-1115 were used to distinguish between Reportable Individuals and Participants. Grantees would appreciate guidance as to whether the removal of Elements 1102-1115 removes the distinction, and therefore the definition, of Reportable Individual.	There needs to be a distinction between reportable individuals and participants. Data element 1116 has been capturing the most recent date of staff assisted basic career services for participants only. The specifications of this data element are being rewritten so that it will capture both reportable individuals and participants.	1

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4.	In light of the removal of PIRL Elements 1100-1115, grantees are concerned that Elements 1004 and 1116 are essentially the same. By definition, Element 1004 includes basic and individualized career services and excludes self-services, information services or activities, and follow-up services which are career services that do NOT require significant staff involvement. This leaves basic and individualized career services that require a significant expenditure of staff involvement. By definition, Element 1116 includes basic career services requiring a significant expenditure of staff involvement.	<p>PIRL 1004 is needed to do aggregate calculations. PIRL 1004 includes basic and individualized services. PIRL 1004 feeds into Employment rate (Q2) and Employment Rate (Q4), and Median Earnings.</p> <p>PIRL 1116 represents participants receiving basic services only. So, while there is overlap in counting basic services with PIRL 1004, the purpose of cells requires that the dates be recorded separately. PIRL 1116 represents the count of staff assisted basic career services. That data element number is pulled into demographic analyses, as well as the aggregate performance measures.</p>	1
5.	Basic career services reported in Element 1116 cannot, by definition, be recorded in data elements 1102-1115 since Elements 1102-1115 are no longer reported. The data that would be included in Element 1116 therefore is technically not “additional” or “other.”	Many programs report using the PIRL. Other programs are using the PIRL 1102-1115 data elements. Therefore, the words “additional” and “other” apply to them.	1
6.	The most recent date of the services will be reported in both Elements 1004 and 1116. Grantees request guidance on whether they report a value for 1004 and just leave 1116 blank. In addition, should grantees include all Basic Services in 1116 and both basic and individualized services in 1004?	<p>See response for NFJP #5.</p> <p>Grantees should not leave either field blank because of perceived overlap. Grantees must include the most recent date of basic or individualized career services in PIRL 1004. Grantees should leave PIRL 1004 and/or PIRL 1116 blank only if the participant did not receive the applicable career services.</p>	1

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7.	Field Label C.8: Eligible migrant and seasonal farmworkers a. Why are we utilizing the WIOA sec 167 definition for all programs? The NFJP program serves a small percentage of WIOA participants, so commenter recommends that the calculation for this line item be changed to include PIRL data element 413 – Migrant Seasonal Farmworker Designation.	See response for NFJP #2.	1
8.	No. 1004 Date of Most Recent Career Service (WIOA), No. 1200 Date of First Individualized Career Service, and No. 1201 Most recent Date Received Individualized Career Service <i>Comment:</i> <i>Grantees are concerned that the inclusion of both basic and individualized career services in 1004 overlaps with reporting Elements in the 1200s (Individualized Services).</i>	PIRL 1004 is needed for aggregated calculations that include the total number of participants. PIRL 1200 represents the first date that a participant received any individualized career service on or after the date of participation. PIRL 1201 is reflects the most recent date which the participant received individualized career services. These participants are included in PIRL 1004. However, they are not the only subset reported in PIRL 1004, which also includes those receiving basic career services.	
9.	No. 1303 Type of Training Service #1 Use the appropriate code to indicate the type of approved training being provided to the participant. NOTE: If OJT or Skill Upgrading is being provided as part of a Registered Apprenticeship program, choose Code 09. NOTE: Code 06 (Other) should only be utilized in rare instances when other codes are clearly not appropriate. <i>Comment:</i> <i>Grantees need further guidance on which code should be used in PIRL data element #1303 to reflect classroom training (community college, technical school, etc. leading to a certificate, credential or degree). In element #2220, grantees are instructed</i>	The definitions of training can be found in the WIOA, Section 134, under Training Services. These codes are aligned with that section of the law. In order to accurately track services being provided by grantees, it is necessary to determine the most appropriate code. In the case where it is a community college program that does not fit anywhere else, code value 06 – Occupational skills training, may be used.	1

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	<i>to record total hours of occupational skills training received, which “includes vocational education and classroom training.” This suggests that the correct choice for classroom training in #1303 might be “06- Other Occupational Skills Training,” but the instructions say that 06 should only be used in rare instances when other codes are clearly not appropriate.</i>		
10.	No. 922 Other WIOA or Non-WIOA Programs Comment: Grantees are requesting guidance on how to record other NFJP programs under data element #922. Would they fall under “1 – Yes, Other WIOA or Non-WIOA Programs”?	Grantees should code value #1 for this data element only when the participant is known to be co-enrolled in another WIOA or non-WIOA program that is not otherwise listed in the PIRL 903-921, PIRL 930-932, or PIRL 936-937.	
Supporting Statement			
1.	Under Evaluation of Program and Activities, it lists coordination and integration of services. What is expected here? Full system integration, reporting integration of all core programs, or within the centers no duplication of services? What does Full System Integration mean, how is this being defined? Full Integration in a reporting system or cross pollination of programs.	WIOA Sec. 169 refers to the responsibilities of the Secretary. The Department regularly engages in program evaluations; these evaluations will include details on the methodology applied and definitions utilized. This section does not refer to integration of management information system at the State Level. WIOA Sec. 168 (a) (1) (E) addresses technical assistance by the Department to facilitate shared registration across programs. WIOA sec. 185(c)(2)) directs that each State, each Local Board, and each recipient receiving funds under title I of WIOA (other than a sub-recipient, sub-grantee, or contractor of a recipient) shall prescribe and maintain comparable management	1

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		information systems, in accordance with guidelines that shall be prescribed by the Secretary, designed to facilitate the uniform compilation, cross tabulation, and analysis of programmatic, participant, and financial data, on statewide, local area, and other appropriate bases, necessary for reporting, monitoring, and evaluating purposes, including data necessary to comply with sec.188.	
2.	Page 5, “Number of Participants who are enrolled in more than 1 of the programs described in WIOA sec. 116(b)(3)(A)(ii)”... Information collected on Rehabilitation, Adult Education, Youth Build, Job Corp, etc. are partners not using the same reporting system and will be staff identified, not system validated. This means the data is underreported for many states where reporting systems are not shared. How are program files combined if these programs are not sharing the same 12 digit identifier, given that it is not required based on TEGL 10-16? How are states to determine the number Co-Enrolled and Number of Participants with Barriers to Employment served by each of the core programs? TEGL 10-16, page 37 states, “Establish a unique identification number that will be retained by the same individual across multiple programs.” This statement does not say required across all core programs, which we are thankful for, but then this is a reporting category that we cannot report on.	States are not required to implement a unique identifier across programs. However, States must determine an approach for identifying and reporting participants enrolled in more than one program described in WIOA sec. 116(b)(3)(A)(ii).	1
3.	Page 6, “General effectiveness of such programs and activities in relation to their cost, including the extent to which the programs and activities improve the employment competencies of participants in comparison to comparably-situated individuals who did not participate in such programs and activities..” How	Comparison or control groups are emphasized in both Sec. 116 (e) and Sec. 169 of WIOA. There are numerous approaches and methodologies that can be used to establish comparably-situated individuals (also referred to as a comparison group). Where a Federal research or evaluation study is being conducted under the provisions of WIOA the methodology for establishing applicable comparison or	1

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	will comparably situated individuals be identified?	control groups will be outlined at the outset of the design of the study. Where States are seeking to do a study under the requirements of Sec. 116 (e), and seek assistance in identifying the most appropriate methodologies for a study or for establishing a comparison or control group, ETA offers technical assistance and support.	
4.	Page 9 under TAA Act Program: requests a “description of efforts made to improve outcomes for workers under trade adjustment assistance program that promote efficiency and effectiveness”. How is efficiency and effectiveness being defined? Is it a qualitative or quantitative measure?	<p>Training and Employment Guidance Letter 06-09, Change 2 outlines the requirement to report efforts to improve outcomes for workers under the Trade Adjustment Assistance Program:</p> <p>“F. EFFORTS MADE TO IMPROVE OUTCOMES For each quarterly submission of individual records, states will be asked to provide a single narrative summary of efforts to improve outcomes for TAA participants. A text field will be provided for states to provide this information as part of the quarterly submission process. This submission requirement is designed to address program improvements performed on behalf of all TAA participants, and not on an individual basis. Efforts described may include those related to improving or increasing outreach, program information provided to workers, case management services, selection of training programs, co-enrollment, follow-up services, or any other efforts the state has made during the reporting quarter to improve outcomes. The narrative should describe the effort and why it is expected to result in improved outcomes.”</p> <p>Efforts to improve outcomes are not currently in the scope of WIPS.</p>	1
5.	Job for Veterans State Grant, Veterans program: field 914 now lists LVER in the report specification. Stating received services from Local Veteran Employment Representative (LVER). Under TEGL 19-13, LVERs should not be dealing directly with job seekers. Page 7 of the TEGL states “LVERS must perform only the duties outlined in 38 U.S.C. 4104 (b), which are related to	Currently, VETS guidance indicates that LVER positions should not deliver direct services to veterans. However, there may be future situations where LVERs are permitted to do so. Implementing this selection into PIRL 914 now allows States to not be rushed to include later.	1

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	outreach to employer community and facilitation within the states' employment service delivery system. Therefore, LVERs must be assigned duties that promote to employers, employer associations, and business groups the advantage of hiring veterans." Why would states record a LVER touching a jobseeker if their responsibility is to the businesses?		
6.	Page 24, listed under burden, certifying 3 reports before transmission to USDOL. Under current reporting, states are certifying 7 reports each quarter, not 3.	The Department has revised the language on page 24 of the Supporting Statement to reflect the current functionality of WIPS. The Department continues efforts to reduce States' reporting burden through enhanced WIPs functionality. Currently, States have the option to upload a full PIRL which requires only one report certification.	
7.	Page 25 has the number of hours by program to complete quarterly reporting. Each program has 4 hours listed. If states are submitting 7 program titles, then the federal government is assuming 28 hours to complete, not the 3 weeks, or 275 hours, that it actually takes to create an extract in the correct format needed to pass edit checks; the number is largely under estimated. Title IV is new to quarterly reporting and their reporting now includes open and closed cases. The estimated time to produce a reporting extract is 130 hours, however not including time to clean edit checks and federal system corrections. Maybe in Year 3, when the related policies, etc. stop changing, it will take less time to complete.	The Department acknowledges that the reporting burden during the start-up phase of any new reporting structure may increase the States' time investment related to reporting. However, the Department anticipates burden to decrease as the programs mature, and as staffs become more familiar with the reporting requirements, and protocols.	1
8.	Page 38 states, "These costs include: enhancements to data collection systems to adhere to WIOA requirements, training staff on data collection rules, and for ETA there is an associated IT cost for transitioning data intake systems to collect exit	The Department has clarified the language to indicate the burden is related to changes necessary to "collect information in a new method to adhere to WIOA requirements." The Supporting Statement is not meant to communicate any change in the definition of Exit; Exit is defined in TEGL 10-16.	

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	<p>information in a new method (i.e., data systems must be able to re-open closed cases if a participant re-enters the program within a given program year)”. The definition of exit in TEGL 10-16 specifies for Title I, Title III, TAA and DWG, etc. as 90 days no services and no future services are scheduled, without looking at self or informational activities, or follow-up. This means that a person could be counted 4 times in a year as a participant. This sentence in the Supporting Statement is implying only one exit per program year which differs from current federal guidance and would require massive system changes with lack of explanation and details of how to implement such change.</p> <p>Reopening cases would cause large gaps in service delivery and impact reporting systems in order to allow such gaps. This will cause issues in supplying follow up if the true exit is not known until the full program year has elapsed. If a person starts services on 6/15/2016, and exits 7/1/2017, based on this “new” meaning, the 7/1/2017 exit is not real because the person may come back during the program year. If said person comes back in on 10/1/17, the exit of 7/1/17 cannot count, but since first participation covered 2 program years,</p> <p>should systems record exit for each program year? What if a participant overlaps a program year, are states to report an exit for each year? This is confusing and beyond system functions.</p> <p>For 15+ years States have recorded the date of exit based on the last service received with no services recorded for 90 days and no services are scheduled. And with the “new” meaning, exit will not be recorded until a program year elapses, to determine when the exit occurred within a program year.</p>		

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9.	Page 5, Average Cost Per Participant. Amount of funds spent on each type of service: The Cost Per Participant Career Service will include any participant with a career service, however, some may have also received training during this same time frame. How then would the funds be differentiated between Career and Training? How will the figures be determined?	The Department has clarified the specifications related to the Average Cost Per Participant to reflect that both participants receiving any level of career services, and any level of training services, or any combination thereof are in the calculation. The Average Cost Per Participant field is determined by calculating the funds expended divided by participants served (Career) and (Training).	1
10.	<p>-The Labor Exchange Reporting System (LERS), authorized under OMB Control Number 1205-0240, is the only current mechanism for collecting performance information on the Wagner-Peyser Act Employment Service and Jobs for Veterans' State grants' activities. As such, this set of reports is necessary for tracking and reporting, to stakeholders, information on the usage, services provided, and performance of these programs. More specifically, these reports are used to monitor the core purpose of the program – mainly, tracking how many people found jobs; did people stay employed; and what were their earnings. It is expected that OMB Control Number 1205-0240 will be utilized for all Program Year 2016 reporting; this ICR will be discontinued after all required reporting is completed. Due to lag times in performance outcomes, this will likely be after the close of Program Year 2017" (Page 12).</p> <p>We are requesting clarification on this item. Does this mean States are to submit a LERS and a PIRL for PY16 and PY17? We have transitioned to reporting Wagner-Peyser and Jobs for Veterans' State grants on the PIRL only and to revert to the LERS would place a substantial burden on the State.</p>	<p>States do not have to submit in LERS, and will not be required to do so. These reports should be submitted through WIPS.</p> <p>The reference to LERS in the supporting statement is only in reference to existing reporting requirements for the Job Openings report. All performance reporting for Wagner-Peyser and JVSG should be done through WIPS.</p>	1
11.	"The Labor Exchange Reporting System (LERS), authorized under	There are no dual reporting requirements. As authorized under OMB Control	

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	<p>OMB Control Number 1205-0240, is the only current mechanism for collecting performance information on the Wagner-Peyser Act Employment Service and Jobs for Veterans' State grants' activities. As such, this set of reports is necessary for tracking and reporting, to stakeholders, information on the usage, services provided, and performance of these programs. More specifically, these reports are used to monitor the core purpose of the program - mainly, tracking how many people found jobs; did people stay employed; and what were their earnings. It is expected that OMB Control Number 1205-0240 will be utilized for all Program Year 2016 reporting; this ICR will be discontinued after all required reporting is completed. Due to lag times in performance outcomes, this will likely be after the close of Program Year 2017" (Page 12).</p> <p>Federal Register, Vol. 82, No. 98, Tuesday, May 23, 2017</p> <p>Docket ID: ETA-2017-0002</p> <p>Agency: Department of Labor Employment and Training Administration</p> <p>a. Please provide clarification. Does this mean that States are required to conduct dual reporting for the Wagner-Peyser program by submitting both the LERS and the PIRL? Commenter recommends that only the PIRL be used for PY 2016-17 as dual reporting places a burden on both the MIS system, as well as the States.</p>	<p>Number 1205-0240, it is no longer required for States to submit Wagner-Peyser or Jobs for Veterans State Grants data.</p>	
12.	<p>"It should be noted that for the following programs - National Farmworker Jobs Program (NFJP); National Dislocated Worker</p>	<p>States already capturing the SSN and conducting the base wage matching for the impacted programs should still submit the SSN to DOL ETA.</p>	

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	<p>Grants; YouthBuild; H-1B grant programs; Senior Community Service Employment Program (SCSEP); Re-entry Employment Opportunities (REO) grants; and Section 166: Indian and Native American programs - in lieu of a non-SSN unique identifier grantees will collect and provide to ETA SSNs which will allow ETA to match wage records for grantees and lessen the burden on grantees to track post-program outcomes” (Page 22-23).</p> <p>a. If the States are already capturing SSN and conducting base wage matching for some of these programs, is it required for the SSN to still be submitted to DOL ETA? Commenter recommends clarifying the language to indicate that the SSN is only required to be sent to DOL ETA if the State is unable to conduct base wage matching for the program.</p>	<p>SSNs for NDWG participants may not be reported to the Department with the following exception: DWG program grantees that are also entities described in WIOA section 166(c) of WIOA (relating to Indian and Native American programs) may not have access to wage records in order to track and report exit-based employment rates and median earnings. Therefore, for section 166 grantees and certain other eligible entities, ETA intends to match wage records on behalf of these grantees in order to capture these specific employment-based outcomes.</p> <p>For the programs noted in this comment, all grantees will be required to submit participant SSNs to the Department.</p> <p>The programs noted by the commenter are discretionary grants that are procured through a competitive process. Discretionary program grantees may include a variety of different types of organizational entities (e.g., non-profit and faith-based organizations, educational institutions, and state and local governments).</p> <p>For the employment-based WIOA primary indicators of performance, some of these discretionary program grantees may not have access to wage records needed to track and report exit-based employment rates and median earnings. Therefore, the Department will match wage records on behalf of grantees in order to capture these specific employment-based outcomes for participants.</p> <p>To ensure that the WIOA primary indicators of performance are calculated and reported consistently across all discretionary program grantees, all grantees will be required to submit participant SSN’s regardless of whether the grantee may have the ability to report outcomes based on wage records.</p>	
13.	Table 1: Quarterly (Program) Performance Report (ETA-9173) Annualized Burden Hour Estimate	a. JVSG burden estimates have been added to all associated tables in the Supporting Statement.	

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	<p>a. Why is JVSG not included as a program? Commenter recommends including JVSG as a separate program as they have their own column with specific required data element in the ETA PIRL.</p> <p>b. Recommend increasing the burden per response for the Adult, Dislocated Worker, and Youth program from 4 to 12 as there are three programs within this grouping.</p>	<p>b. The burden per response for the 3 program represents indicates a response from 1 of the programs.</p>	
14.	<p>Table 2: Quarterly (Program) Performance Report (ETA-9173) Annualized Burden Cost Estimate</p> <p>a. Why is JVSG not included as a program? Commenter recommends including JVSG as a separate program as they have their own column with specific required data element in the ETA PIRL.</p>	<p>See response for Supporting Statement #12.</p>	1
15.	<p>Table 5: Participant Annualized Third-Party Disclosure Burden Hour Estimate</p> <p>a. Why is JVSG not included as a program? Commenter recommends including JVSG as a separate program as they have their own column with specific required data element in the ETA PIRL.</p> <p>b. Recommend increasing the burden per response for the Adult, Dislocated Worker, and Youth program from .25 to 0.75 as there are three programs within this grouping.</p>	<p>a. The Department has added JVSG as a separate program.</p> <p>b. Although there are 3 programs grouped together within this category each program provides one response and <u>each</u> response will take .25 hours (15 minutes). If we increased the burden per response to .75 hours (45 minutes), we would be indicating that each program provides one response and <u>each</u> response will take 45 minutes when that is not the case.</p>	1
16.	<p>Table 6: Recordkeeping WIOA Participant Individual Record Layout (PIRL) (Hours)(ETA-9172)</p>	<p>a. The Department has added JVSG as a separate program.</p>	

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	<p>a. Why is JVSG not included as a program? Commenter recommends including JVSG as a separate program as they have their own column with specific required data element in the ETA PIRL.</p> <p>b. Recommend increasing the burden per response for the Adult, Dislocated Worker, and Youth program from .25 to 0.75 as there are three programs within this grouping.</p>	<p>b. Although there are 3 programs grouped together within this category each program provides one response and <u>each</u> response will take .25 hours (15 minutes). If we increased the burden per response to .75 hours (45 minutes), we would be indicating that each program provides one response and <u>each</u> response will take 45 minutes when that is not the case.</p>	
17.	<p>• PIRL Field 2700, SSN: On page 22 of supporting statement lists the programs where SSN is required. "It should be noted that for the following programs - National Farmworker Jobs Program (NFJP); National Dislocated Worker Grants; YouthBuild; H-1B grant programs; Senior Community Service Employment Program (SCSEP); Re-entry Employment Opportunities (REO) grants; and Section 166: Indian and Native American programs." Under the data specifications, National Dislocated Worker Grant is not listed with an R for reporting, however the supporting statement has the DWG program listed in the grouping.</p>	<p>The Department corrected the Supporting Statement to align with the data specifications for the NDWG program. The SSN is not a required data element for participants of a NDWG, except for those through grantees that are also entities described in WIOA section 166(c) of WIOA (relating to Indian and Native American programs) and certain other eligible entities (as designated by the Secretary).</p>	1
FRN			
1.	<p>Please clarify the statement as seen in the ICR Supplementary Information section: "Under this collection, participation will be measured based on the count of individuals who meet the definition of a 'participant' - e.g. those who have received staff-level services within the</p>	<p>Language in the FRN was inadvertently left in the supporting statement from the original June 2016 ICR publication. The Department will allow for multiple periods of participation in a single program year.</p>	

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	<p>program year. An individual should be considered to have exited after they have gone 90 days without service, and with no future services scheduled. Should they return for additional services after the 90 days - within the same program year and exit in that same program year - the individual's exit date will be changed to reflect only the last exit date in that program year."</p> <p>Does this apply only if the funding stream is the same? For example, a participant enrolled in WIOA Youth who exits, comes back for services after 90 days again as a WIOA Youth. If the first enrollment is under WIOA Youth and the second is under WIOA Adult, does this condition still apply? Since the date of exit will be changed to reflect only the last exit date in that program year, are we to assume the date of participation will be the date of the first enrollment? If so, do program eligibility requirements still apply for the second enrollment?</p> <p>Does this apply to a participant who is an Out of School Youth in the first enrollment and then an In School Youth in the second enrollment?</p> <p>This could become confusing for WIOA data validation purposes when considering program eligibility documentation, data elements which apply to conditions at exit, etc. Further detailed guidelines would be needed and time for changes to states' MIS systems.</p>		
2.	3.Federal Register Vol 82, No. 98 dated May 23, 2017, states the following:	See response for FRN #1.	

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	<p>"Under this collection, participation will be measured based on the count of individuals who meet the definition of a "participant"e.g., those who have received staff-level services within the program year. An individual should be considered to be exited after they have gone 90 days without service, and with no future services scheduled. Should they return for additional services after the 90 dayswithin the same program year and exit in that same program yearthe individual's exit date will be changed to reflect only the last exit date in that program year. If the individual exits in a subsequent program year, they would be counted as a new participant for purposes of that subsequent program year. Counting unique individuals in this manner will allow an unduplicated count of participants in the accountability and reporting system."</p> <p>Is it expected that states will report both records and the unduplicated count will occur within reports or is it intended that states collapse both enrollment records into one record?</p>		
3.	<p>The Federal Register Notice relating to this ICR included a proposal to radically change the way WIOA 7 participants are reported and the primary basis for the accountability system. Specifically, the FRN 8 says: 9</p> <p>"An individual should be considered to have exited after they have gone 90 days without service, 10 and with no future services scheduled. Should they return for additional services after the 90 days—11 within the same program year and exit in that same program year—the individual's exit date will be 12</p>	See response for FRN #1.	

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	<p>changed to reflect only the last exit date in that program year. If the individual exits in a subsequent 13 program year, they would be counted as a new participant for purposes of that subsequent program 14 year. Counting unique individuals in this manner will allow an unduplicated count of participants in 15 the accountability and reporting system.” 16</p> <p>This model was also proposed originally as part of the Departments of Labor and Education Joint 17 Performance Reporting ICR in 2015 and was ultimately rejected after strong arguments from the public 18 and careful analysis by federal staff. Staff reached out to DOL to find out why this was back up for 19 discussion AND why it was contained in a DOL-only document when it so clearly would be a “joint” 20 reporting issue. We were told that this was a “copy-and-paste” mistake and was not being proposed. 21 We are pleased that DOL has not re-proposed the combining of POPs both exit in the same year as the 22 Departments of Education and Labor originally proposed in 2015 and reiterate our opposition to such a 23 policy should it ever be considered in the future.</p>		
4.	<p>In response to changing the exit date of a subsequent period of participation when you have two or more participation periods in a program year, Montana’s comments are: Their stated reason for making this change is: “Counting unique individuals in this manner will allow an unduplicated count of participants in the accountability and reporting system.” If this is DOL’s goal, they can already achieve this with the</p>	See response for FRN #1.	

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	<p>current PIRL. We are already required to report element #100 Unique Individual Identifier. DOL has already stated in the description of this field that this will be used to get a count of unique participants for a program year.</p> <p>Under the new guidance, we would effectively be submitting less information. If DOL really wanted to, they could combine the participation periods on their end. If we combine them on the State’s end, they lose information. Anyone with multiple exits now looks like one continuous participation period. If later, you want to analyze gaps between participation periods, you no longer have reliable data. We also report the values of some of the fields held at program entry. These fields can change so if we combine participation periods, we must choose to report the earlier or later values (most likely earlier). This means we would have no knowledge of changes in risk factors and may draw incorrect conclusions.</p> <p>We do not have enough guidance to make this change. This requirement is essentially asking states to retroactively change data. This brings up numerous questions for how we should report data and how we should resolve conflicts. For example, someone exits during Q1. In Q2 we report post exit data. In Q3 they receive new services creating a new participation period, and they do not exit. For Q3 we should now report two rows, the original one with an exit date and the new one with no exit date. In Q4 they exit again. Are we expected to report 1 row for Q1, Q2, and Q4, but 2 rows for Q3? What do we do about the post exit data from Q2 in Q3 and Q4?</p>		

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	The performance measure for Measurable Skill Gain would have a negative affect for States if this change is made. Currently, states are able to count one gain per year per period of participation. If the participation periods were combined for a Program Year, states would miss any MSG that happened during a 2nd or 3rd period of participation in the year.		
5.	<p>1. "An individual should be considered to have exited after they have gone 90 days without service, and with no future services scheduled. Should they return for additional services after the 90 days—within the same program year and exit in that same program year—the individual's exit date will be changed to reflect only the last exit date in that program year. If the individual exits in a subsequent program year, they would be counted as a new participant for purposes of that subsequent program year. Counting unique individuals in this manner will allow an unduplicated count of participants in the accountability and reporting system."</p> <p>We understand from the comments submitted by Texas, tracking number 1k1-8xl7-945f, that this change is actually not being proposed. We hope this is accurate, however, if it is part of the proposal we see this change as a significant burden on States. The complexities of this method of reporting would require significant modification to MIS reporting systems, and require extensive instruction to States on the business rules for collapsing multiple participation episode into one under certain circumstances and not under others. The effort to understand, implement, test and provide this method of reporting would</p>	See response for FRN #1.	

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	place a significant burden on each state. Additionally, it seems that DOL will have all the necessary information to collapse multiple exits during a program year into one from the PIRL provided by each state. Doing so at the federal level would be less error-prone and more cost-effective than requiring each state to perform this task.		
6.	FRN: "An individual should be considered to have exited after they have gone 90 days without service, and with no future services scheduled. Should they return for additional services after the 90 days within the same program year and exit in that same program year the individual's exit date will be changed to reflect only the last exit date in that program year. If the individual exits in a subsequent program year, they would be counted as a new participant for purposes of that subsequent program year. Counting unique individuals in this manner will allow an unduplicated count of participants in the accountability and reporting system." We would like to confirmation that this is in error.	See response for FRN #1.	
7.	1. "Under WIOA section 116(d)(6), the Secretary of Labor is required to annually make available (including by electronic means), in an easily understandable format, (a) the State Annual Performance Reports containing the information described in WIOA section 116 (d)(2) and (b) a summary of the reports, and the reports required under WIOA section 116 (d)(6) (the State Performance, Local Area, and Eligible Training Provider Reports), to the Committee on Education and the Workforce of the House of Representatives and the Committee on Health, Education,	See response for FRN #1.	

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	<p>Labor, and Pensions of the Senate.”</p> <p>a. The Departments have not provided the necessary information for States to complete the Eligible Training Provider Report for Program Year 2016. It is an unrealistic expectation for States to have to complete this report for PY 2016-17 with no report specifications, finalized definitions, or the cohorts identified for this report. This report requires data on individuals not served through the WIOA program, so it is unrealistic to expect that States can create an MIS system, and gather the data needed to produce the report within such a short timeframe. Since an annual report is not considered complete unless the ETP report is submitted and made publicly available, and not submitting the ETP report is considered a sanctionable offense, Commenter strongly encourages the Departments to provide States with a waiver for the ETP reporting requirements for the PY 2016-17 annual report.</p>		
8.	<p>2. “An individual should be considered to have exited after they have gone 90 days without service, and with no future services scheduled. Should they return for additional services after the 90 days—within the same program year and exit in that same program year—the individual’s exit date will be changed to reflect only the last exit date in that program year. If the individual exits in a subsequent program year, they would be counted as a new participant for purposes of that subsequent program year.”</p> <p>a. This type of reporting will place a burden on the States to update and change existing MIS systems and current reporting</p>	See response for FRN #1.	

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	practices. The Wagner-Peyser program often has participants return within the same program year, so this type of calculation will place a burden on the staff managing the program's performance. In addition, this type of policy and the impact on performance may be punitive to States that have implemented a common exit policy. To promote coenrollment across WIOA programs, and to reduce reporting and performance confusion, it is recommended that definition of exiter and period of participation as outlined in TEGL 10-16 is maintained.		
9.	<p>The ICR proposes to change the exit methodology as follows: “An individual should be considered to have exited after they have gone 90 days without service, and with no future services scheduled. Should they return for additional services after 90 days—within the same program year and exit in that same program year—the individual’s exit date will be changed to reflect only the last exit date in that program year. If the individual exits in a subsequent program year, they would be counted as a new participant for purposes of that subsequent program year. Counting unique individuals in this manner will allow an unduplicated count of participants in the accountability and reporting system.</p> <p>We disagree with this proposed exit methodology.</p> <ul style="list-style-type: none"> • An ever-moving exit target significantly complicates evaluation of primary indicators for individual programs. • The exit cohort is especially critical regarding the credential attainment measure. Unlike other measures that rely primarily on wage record matching, this measure requires staff follow-up 	See response for FRN #1.	

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	<p>to validate and document credentials, as well as enrollment in education or training, within one year after exit.</p> <ul style="list-style-type: none"> • It would create an erroneous continuous participation period. • Participant characteristics captured at the first participation may differ from those captured at the second program entry, and thus impact the statistical adjustment model for individual measures. 		
Miscellaneous/No Action			
1.	<p>5. Changing Customer Characteristics</p> <p>As we did in prior comments, we again raise the question of being able to update some customer 6 characteristics during a POP. In response to earlier comments, regarding states being able to update 7 some customer characteristics during a Period of Participation, the Departments of Education and Labor 8 indicated that it would be too burdensome to require programs to update characteristic data related to 9 barriers to employment. However, DOL also said that they would “continue to discuss the gains and 10 potential downfalls of allowing states to alter this data throughout the participation period.” 11</p> <p>Therefore, we would like to again advocate in favor of grantees being able to update data when it 12 changes during a POP. To be clear, we’re not advocating a system whereby we would continuously poll 13 Participants on their current status on dozens or hundreds of elements. However, some elements could 14 be automatically updated with no cost and others are easily</p>	<p>The Department acknowledges these comments, however either a response is not warranted, or further action from the Department is not needed.</p>	

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	<p>discovered during the normal course of 15 working with a Participant. 16</p> <p>For example, if a job seeker hears rumors of layoffs and becomes a Participant in anticipation of that 17 possible eventuality, he would be considered “employed” for reporting even if he is ultimately laid off a 18 few weeks later. If he’s working with staff, that change in employment status is likely to come up during 19 natural conversation about their job search efforts. Not only that but if he filed for a UI claim, then that 20 data could easily be updated via data connection to the UI system. 21</p> <p>In another case, we could have a person who was being served as a transitioning service member, but 22 whose military discharge date was known and being planned for as part of the service plan. If the TSM 23 were to reach her discharge date and become a veteran prior to exit, then she should be reported as a 24 veteran. That information would be easily available and highly relevant to service delivery (as well as of 25 high value to DOL-VETS in ensuring priority of service to veterans). 26</p> <p>We also think that WIOA §116’s requirements to report data broken out by various characteristics, such 27 as Barriers to Employment, support (and perhaps even would mandate) updating data during a POP. 28 One can easily imagine a case were a person “gains” a barrier to employment during their POP, such as 29 someone who had never had an interaction with the criminal justice system, but who is arrested during 30 their POP and who now has that arrest record be the first thing that shows up in an online search by 31 prospective employers. That is clearly a barrier and should be reported as such and accounted</p>		

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	for in 32 the statistical models for setting performance expectations		
2.	<p>Supported Changes 3 We do support a number of changes proposed in this ICR and want to highlight two: 4 a) Element 914 now provides for reporting when a Participant receives service from a Local Veterans 5 Employment Representative (LVER), but the element also needs to indicate if the Participant 6 received services from both the LVER and Disabled Veterans Outreach Program. This is something 7 we advocated in response to the original ICR publication in 2015. 8 b) We support removal of the reference to “self-service” in elements 1100 and 1101, but wonder 9 whether you need to add another field for “Most Recent Date Received Career Served Accessed via 10 Self-Service.”</p>	The Department acknowledges these comments, however either a response is not warranted, or further action from the Department is not needed.	
3.	<p>General Comments Overall the reporting requirements on the PIRL are invasive and burdensome for states. The reporting requirements are not sustainable if WIOA continues to suffer severe program funding cuts. The amended DOL ONLY PIRL has 520 elements. This is an inordinate amount of data that is being required from each state and many of those receiving services are receiving career services. Each state invests significant efforts to capture and report all of this data each quarter. Reducing the reporting burden and focusing on outcomes would allow states to refocus funding they are currently spending on reporting requirements for innovative efforts that benefit the workforce. Many of these</p>	The Department acknowledges these comments, however either a response is not warranted, or further action from the Department is not needed.	

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	reporting requirements should be scrutinized to determine the value they add to the development of the U.S. workforce.		
4.	Utah believes the changes made to element 413 are very positive. The change of only requiring states to report if the customer is seasonal OR migrant allows for more accurate and straightforward data.	The Department acknowledges these comments, however either a response is not warranted, or further action from the Department is not needed.	
5.	<ul style="list-style-type: none"> Measurable Skill Gains: It is appreciated that MSG is now looking at Training/Education Completion Dates for who is included in the measure. If the most recent date of MSG is utilized/recorded, a date for one program year could overwrite a date for a prior program year. The extract would therefore not contain historical data of the first gain in the next program year reporting. The same situation applies with post test scores, because only posttest is recorded, the individual's score gain is not shown year after year, or month after month. 	The Department acknowledges these comments, however either a response is not warranted, or further action from the Department is not needed.	
6.	PIRL 413 - Migrant and Seasonal Farmworker Designation a. The State appreciates the change for this element as it will simplify data capture which will lead to more accurate data.	The Department acknowledges these comments, however either a response is not warranted, or further action from the Department is not needed.	
7.	No. 1004 Date of Most Recent Career Service (WIOA) and No. 1116 Most Recent Data Received Staff-Assisted Basic Career Services (Other)	The Department acknowledges these comments, however either a response is not warranted, or further action from the Department is not needed.	

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	<p>No. 1004: Record the date on which career services (both basic and individualized) were last received (excluding self-services, information services or activities, or follow-up services). Leave blank if the participant did not receive career services.</p> <p>No. 1116: Record the most recent date on which the participant received basic career services requiring a significant expenditure of staff involvement, if said basic career service is not otherwise recorded in data elements 1102-1115. These additional basic career services may include, but are not limited to, (a) reemployment services; (b) federal bonding program; (c) job development contacts; (d) referrals to educational services; and (e) tax credit eligibility determination. Leave blank if the participant did not receive any other basic career services.</p>		
Irrelevant			
1.	The data set appears clean enough. On our previous grant we created something very similar to your Excel Spreadsheet but with a "feeder" sheet where Participants information/demographics were listed and the report data was automatically fed in to the Report by formulas. That would be easy enough to do, and saves time and increases accuracy over calculating manually.	The Department- received a number of comments that were non-substantive and/or unrelated to the contents of this information collection request. Consequently, we will not respond to those comments as they are outside the scope of this ICR or require no response/action.	
2.	We continue to question the excessive data collection for Wagner-Peyser (WP), which is a universal access program.	The Department received a number of comments that were non-substantive and/or unrelated to the contents of this information collection request. Consequently, we	

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	<p>Examples include multiple questions regarding disability (data elements 203-209) and individual characteristics such as homeless or runaway youth (#800), low income status (#802), English language learner (#803), basic skills deficient (#804), cultural barriers (#805), single parent (#806), displaced homemaker (#807), etc.</p> <ul style="list-style-type: none"> • How is WP expected to collect this data when staff-assisted services can be provided virtually? • How would WP staff be expected to know what makes someone low income or basic skills deficient, as these characteristics are applicable to Title I programs? • Is this data collected from self-attestation or is documentation required for WP? • Will any of this data be included in WP data validation? • If the questions can all be answered “No” by participants and/or staff, then how accurate is the data? <p>WP funding does not support the additional workload for staff to collect all of this data. Unnecessary data collection takes time away from serving customers. If an individual just wants assistance in finding a job and/or being referred to a job, this invasive data collection will not be warmly received. Our labor exchange system should be customer friendly and efficient. It should not be viewed as bureaucratic and burdensome.</p>	<p>will not respond to those comments as they are outside the scope of this ICR or require no response/action.</p>	
3.	Section D.02 - Wage Record Data	The Department received a number of comments that were non-substantive and/or	

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	<p><i>Comment:</i></p> <ul style="list-style-type: none"> • <i>Grantees request guidance on whether or not wage record data means only UI-wage based data.</i> 	<p>unrelated to the contents of this information collection request. Consequently, we will not respond to those comments as they are outside the scope of this ICR or require no response/action.</p>	