



October 27, 2022

Mr. Scott Gibbons  
Chief Data Officer  
Office of the Assistant Secretary for Policy  
U.S. Department of Labor  
200 Constitution Avenue NW  
Washington, DC 20210

Dear Mr. Gibbons:

On behalf of our respective organizations, we are writing in response to the Department of Labor's "Request for information on design and implementation features for open data services provided by the Department of Labor" (Docket No. DOL-2021-0005). Thank you for the opportunity to provide input on these important issues. Our comments relate to the following categories in the Department's RFI: #1 Data content and format; #2 Data documentation; #3 Data formats specific to certain analysis patterns; #4 Data quality issues; #5 Challenges with data comparability; and #10 Specific data sets and methodologies.

We write to recommend that the Department prioritize the creation of a national employment metrics system for workforce development programs that leverages national labor market outcomes information to substantially improve the transparency, availability, and quality of provider participation and outcomes data and support innovation across the workforce system. While our comment focuses on data for Eligible Training Programs (ETPs) under the Workforce Innovation and Opportunity Act (WIOA), we believe this prospective new system could also incorporate providers across the array of federal workforce funding streams, such as SNAP Employment and Training (E&T).

Today, it is far too difficult for stakeholders across the workforce system to access even basic information about federally funded training programs and participants' outcomes, including long-term labor market outcomes. This persistent challenge has frustrated informed decision-making by workers, providers, career navigators, and policymakers at every level of government and makes it more difficult to help participants achieve sustained economic mobility. It is very difficult, for example, to assess the degree to which programs may or may not advance equity goals without information on participants' demographics.

In addition, the current reporting system places substantial burden on stakeholders across the system, particularly providers, while providing little support for continuous improvement and innovation. Providers that report into the current system, for the most part, are not able to leverage the outcomes data ultimately produced for continuous improvement beyond the limited public data available. A more streamlined system that leverages federal labor market outcomes data would substantially improve quality while reducing burden.

Moreover, the current system does not provide sufficient opportunity to highlight the potential contributions of effective providers that could advance economic mobility. Innovative providers who seek to know and publicly release their outcomes data but do not already receive WIOA funds in a given state are unable to participate in the existing performance infrastructure and make their case for funding moving forward.

We call on the Department to build on the foundation it has already established, as well as an array of excellent state-led efforts. The current federal resource, TrainingProviderResults.gov, offers a starting point, but issues with missing data, data quality, and inaccessibility of data make it far less useful than it could be. At the state level, we believe providing national infrastructure can enable far more states to publish locally-relevant scorecards. The Department can help jurisdictions access national labor market outcomes data and provide a common technical framework that enables states to focus on developing locally-relevant tools, as opposed to reinventing the wheel in each jurisdiction.

## I. Issues with the Present System

First, we discuss issues with the present system that have substantially limited its utility: missing data, data quality, inaccessibility of data, and infrastructure barriers.

### A. Missing Data

TrainingProviderResults.gov is missing or has suppressed costs and outcomes data on a tremendous number of programs, as any user will quickly find. For example, an applicant starting their search from the Department of Labor headquarters' zip code of 22201 will find that only six of the first 30 programs reported alphabetically have any outcomes data available – and only two of those six programs report on employment and earnings outcomes as opposed to simply completion rates. Across the nearly 75,000 programs with data reported on TrainingProviderResults.gov, only 18 percent have any data available on median earnings two quarters after participants' exit. And while about 96 percent of programs have data available on participants' out-of-pocket tuition cost, only 5 percent of programs have any published data on average individual training account expenditures.

In a 2022 paper, Diego Briones and Sarah Turner of the University of Virginia analyzed TrainingProviderResults.gov data from Washington and Texas—two states with better-than-average reporting—and found that “[t]he proportion of missing data on outcomes across states is striking.”<sup>1</sup> In Washington, for instance, 38 percent of ETPs had no completion rate data and 48 percent had no 2<sup>nd</sup> quarter median earnings data available. Data on programs not delivered by institutions eligible under Title IV of the Higher Education Act are particularly limited: In Washington, 76 percent of non-Title IV programs had no completion data available, compared with 25 percent of Title IV programs. It is simply not possible for any user—a prospective training participant, navigator, or policy analyst—to use the system and compare programs in a reasonable manner.

Although it appears that both small program sizes and limited years of data have contributed to this problem, Briones and Turner comment that “[t]he data, unfortunately, do not allow us to distinguish how these factors contribute to the missing data problem.” While we recognize that states only began reporting this data for program year 2018, by September 2022, TrainingProviderResults.gov has still not uploaded data for program year 2021, nearly a year after states reported that data by October 2021.<sup>2</sup>

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<sup>1</sup> Briones and Turner (2022), “Performance Measures and Postsecondary Investments for Adult Students,” in *Student Outcomes and Earnings in Higher Education Policy* at p. 57-92, American Enterprise Institute, <https://www.aei.org/wp-content/uploads/2022/01/Student-Outcomes-and-Earnings-in-Higher-Education-Policy.pdf>.

<sup>2</sup> According to a timeline outlined in the Department's Training and Employment Notice 8-21, [https://www.dol.gov/sites/dolgov/files/ETA/advisories/TEN/2021/TEN\\_08-21.pdf](https://www.dol.gov/sites/dolgov/files/ETA/advisories/TEN/2021/TEN_08-21.pdf).

Regarding data suppression, it is not clear exactly which rules ETA has applied and how they may have suppressed outcomes for small programs.<sup>3</sup> As we discuss below, recent research offers guidance on ways to roll up data across program years that could substantially improve transparency on program outcomes.

### *B. Data Quality*

In addition, there are issues with the quality of the underlying outcomes data available. We appreciate the Department's continual efforts to strengthen validation of the data and to encourage participants to engage in data matching using administrative data, including efforts across states, and call on the Department to build on this progress moving forward.<sup>4</sup>

First, there is an ongoing issue with employment rate data quality. Briones and Turner's report notes that these data may not be trustworthy, "resulting in part from limited data and misalignment in the points of observation."<sup>5</sup> As Briones and Turner show, TrainingProviderResults.gov shows duplicate observations of training providers and it is difficult to understand which observation matches to which cohort; they also point out that the Department is aware of these issues. As the Department responded in a 2020 information collection regarding WIOA reporting through the Participant Individual Record Layout (PIRL), "Under the current collection, the denominators of the performance indicator cohorts do not align to the numerator cohorts, nor are they aligned to the WIOA reports submitted as a part of the PIRL reports submitted. This is not only out of alignment, but can result in scenarios where states report accurate counts that cannot be converted into accurate rates over 100%, which is not helpful to consumers."<sup>6</sup>

Second, it is not clear to TrainingProviderResults.gov users which median earnings data is reported. The data documentation appears to only include median earnings for *all* students, as opposed to WIOA participants alone, whereas other outcomes measured are reported both for all students and for WIOA participants alone where available. As the site describes in a footnote to program outcome pages, "While states generally have reported the 'all students' data they were able to collect, for some programs of study the "all students" data may be limited to only the WIOA students who received training through the program." It is not immediately clear why the site does not also report median

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<sup>3</sup> TrainingProviderResults.gov states only that the Employment and Training Administration (ETA) "applies suppression rules to the data before publishing." <https://www.trainingproviderresults.gov/#!/about> Our understanding is that the Department has access to the original, unsuppressed data as reported by states, per the Department's Training and Employment Guidance Letter No. 03-18, and as such can make its own suppression determinations: "All data, regardless of the ultimate application of suppression standards for the protection of PII, still must be reported to DOL to comply with the statute. States may provide additional information that they determine to be useful." [https://www.dol.gov/sites/dolgov/files/ETA/advisories/TEGL/2018/TEGL\\_3-18.pdf](https://www.dol.gov/sites/dolgov/files/ETA/advisories/TEGL/2018/TEGL_3-18.pdf).

<sup>4</sup> E.g., the 2016 joint guidance on data matching of performance data and recommending that states calculate wage and employment outcomes by matching data. See Training and Employment Guidance Letter No. 7-16, [https://www.dol.gov/sites/dolgov/files/ETA/advisories/TEGL/2016/TEGL\\_7-16.pdf](https://www.dol.gov/sites/dolgov/files/ETA/advisories/TEGL/2016/TEGL_7-16.pdf); and Training and Employment Guidance Letter No. 3-18 attachment 2. [https://www.dol.gov/sites/dolgov/files/ETA/advisories/TEGL/2018/TEGL\\_3-18 Attachment 2 acc.pdf](https://www.dol.gov/sites/dolgov/files/ETA/advisories/TEGL/2018/TEGL_3-18_Attachment_2_acc.pdf).

<sup>5</sup> See Briones and Turner at page 66.

<sup>6</sup> Departments of Labor and Education (2020), "Information Collection Request: Workforce Innovation and Opportunity Act (WIOA) Common Performance Reporting Summary of 60-Day Federal Register Notice (FRN) Comments and Responses," [https://www.dol.gov/sites/dolgov/files/ETA/Performance/pdfs/Comments%20and%20Responses\\_Joint%20ICR.pdf](https://www.dol.gov/sites/dolgov/files/ETA/Performance/pdfs/Comments%20and%20Responses_Joint%20ICR.pdf)

earnings specific to only WIOA participants, as that data is already collected in standard ETP program reporting.<sup>7</sup>

By comparison, a growing body of research in the higher education context demonstrates that earnings data from state-level data alone, as opposed to national-level estimates, may underestimate program outcomes. For instance, as a 2017 Department-funded study found, states' systems may provide a substantially different picture of outcomes than national data in regions where labor markets stretch across states—such as in New Jersey, which borders the New York and Philadelphia labor markets.<sup>8</sup> A 2020 analysis by the Urban Institute found that earnings estimates from in-state wage data tend to be lower than national estimates, particularly for colleges close to metro areas in a different state.<sup>9</sup> A 2019 analysis by the Census Bureau suggests that in-state estimates of colleges' earnings outcomes may be lower than national estimates (e.g., from the Longitudinal Employer-Household Dynamics program) because students who move out of state might be more likely to earn more than those who do not move.<sup>10</sup>

Third, the data on costs seems potentially suspect based on our review. For example, TrainingProviderResults.gov reports that a handful of programs reportedly receive nearly \$100,000 per WIOA participant from individual training accounts—far more than we would expect any local board to expend. These outliers suggest additional data cleaning and review is necessary to catch potential reporting and calculation errors.

### C. *Inaccessibility of Data*

Critically, the data available at TrainingProviderResults.gov has significant gaps that hamstring its usefulness for any audience, whether jobseekers or policymakers. Major issues include:

- The site only reports median earnings in the second quarter after participants exited the program, not even including the subsequent fourth quarter data the Department already collects through the ETA-9171 form—much less longer-term earnings data that could provide a better sense of long-run impacts.<sup>11</sup>
- There is no data regarding participants' demographics, in sharp contrast to the College Scorecard. However, the Department already collects this data through the ETA-9171 form (e.g., ages of participants, race/ethnicity). This data is essential to understand programs' impact. The U.S. House of Representatives Appropriation Committee's Fiscal Year 2023 report, for example,

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<sup>7</sup> See data element number 141 of the TrainingProviderResults.gov data dictionary, [https://www.dol.gov/sites/dolgov/files/ETA/Performance/pdfs/ETA\\_9171\\_12.4.17.pdf](https://www.dol.gov/sites/dolgov/files/ETA/Performance/pdfs/ETA_9171_12.4.17.pdf).

<sup>8</sup> Davis et al. (2017), *Comparing State and National Approaches to Education and Training Program Scorecards*, IMPAQ International, prepared for the U.S. Department of Labor, <https://www.dol.gov/sites/dolgov/files/OASP/evaluation/pdf/Comparing-State-and-National-Approaches-to-Education-and-Training-Program-Scorecards-Final-Report.pdf>.

<sup>9</sup> Blagg and Washington (2020), *Which Dollars Get Measured? Assessing Earnings Metrics Using Data from Connecticut*, Urban Institute, [https://www.urban.org/sites/default/files/publication/101637/which\\_dollars\\_get\\_measured\\_0\\_4.pdf](https://www.urban.org/sites/default/files/publication/101637/which_dollars_get_measured_0_4.pdf).

<sup>10</sup> Foote et al. (2021), "Post-Secondary Employment Outcomes Technical Documentation," U.S. Census Bureau, <https://lehd.ces.census.gov/doc/PSEOTechnicalDocumentation.pdf>.

<sup>11</sup> Department of Labor, "ETA-9171: Data Element Definitions/Instructions," [https://www.dol.gov/sites/dolgov/files/ETA/Performance/pdfs/ETA\\_9171%20PY%202022%20\(Accessible\)%20.pdf](https://www.dol.gov/sites/dolgov/files/ETA/Performance/pdfs/ETA_9171%20PY%202022%20(Accessible)%20.pdf)

noted that few federal or federally funded workforce training programs track outcomes by race and recommended “careful evaluation of disaggregated racial data.”<sup>12</sup>

- It is also difficult for users to have a sense of programs’ relative impacts and costs. The site does not report participants’ earnings before entering the program, limiting stakeholders’ ability to understand the true impact of a program (even recognizing the potential that some providers may cream participants). The College Scorecard, for instance, provides data comparing institutions to national midpoints for similar institutions; TrainingProviderResults.gov only provides comparisons to all programs nationwide. Moreover, TrainingProviderResults.gov’s interface buries cost data under an “Additional Data” option.
- The website provides only limited context specific to local labor markets. It is not possible for a jobseeker to understand, for instance, which professions are in short supply within their own labor market.

At the state level, several states have implemented useful tools to help jobseekers and navigators consider and compare outcomes from various workforce programs.<sup>13</sup> For instance:

- Washington Career Bridge provides users with data on the industry of employment for programs’ graduates, as well as statewide earnings and employment trends for jobs related to programs of that type.<sup>14</sup>
- Minnesota’s Career and Education Explorer tool offers jobseekers extensive data regarding demand for occupations, wages, daily work activities, required certifications, and the local cost of living specific to their region, as well as a direct link to job postings.<sup>15</sup> The tool also enables jobseekers to quickly find a list of relevant programs in their local area, including whether the program is WIOA-certified.
- New Jersey Training Opportunities portal provides particularly extensive performance data on workforce programs, including displaying earnings and employment data for participants up to two years post-exit, as well as in-depth costs data.<sup>16</sup> The site highlights programs that are in in-demand occupations as identified by the state’s Labor Demands Occupations List as those “that are expected to have a greater need for workers than there are qualified people to fill those jobs.” In addition, the site provides an array of data to help participants take advantage of programs, including bus and train routes, on-site childcare availability, and languages spoken by staff, as well as flagging programs that are particularly in-demand.

However, the quality and usefulness of these state-level resources varies dramatically.<sup>17</sup> For some states, it is difficult to even find the states’ Eligible Training Provider List, let alone a useful comparative

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<sup>12</sup> See page 22 of Report of the Committee on Appropriations (2022), *Departments of Labor, Health, and Human Services, and Education, and Related Agencies Appropriations Bill, 2023*, U.S. House of Representatives, <https://www.congress.gov/117/crpt/hrpt403/CRPT-117hrpt403.pdf>.

<sup>13</sup> See Vilsack and LaPrad (2022), *Data for an Inclusive Economic Recovery*, National Skills Coalition, <https://nationalskillscoalition.org/wp-content/uploads/2022/05/FINAL-for-Web-Data-for-an-Inclusive-Economic-Recovery.pdf>.

<sup>14</sup> <https://www.careerbridge.wa.gov/>

<sup>15</sup> <https://apps.deed.state.mn.us/lmi/cpt/home>

<sup>16</sup> <https://njtrainingsystems.dol.state.nj.us/Search/SearchByOccupation.aspx>

<sup>17</sup> While now out of date, for context a 2014 Department-funded report found that at that time, only five states had consumer report card systems available. Davis et al (2014), *Using Workforce Data Quality Initiative Databases to Develop and Improve Consumer Report Card Systems*, IMAP International, prepared for U.S. Department of Labor, [https://www.dol.gov/sites/dolgov/files/OASP/legacy/files/IMPAQ\\_Scorecards\\_Report\\_2014-06-02.pdf](https://www.dol.gov/sites/dolgov/files/OASP/legacy/files/IMPAQ_Scorecards_Report_2014-06-02.pdf).

resource. Given widespread challenges with technical capacity in state workforce agencies, as we discuss below, we believe that the unnecessary burden states face in linking and preparing data is a major reason there are not more high-quality resources available.

#### *D. Infrastructure Barriers*

While state-level workforce longitudinal administrative databases are essential, ultimately we believe that national linkages are also critical to adequately assessing and reporting on workforce development programs' participation, costs, and outcomes. This challenge has had serious consequences for innovation and effective use of workforce dollars—for instance, many of the providers with the strongest evidence of positive impacts on economic mobility have built their evidence base at significant cost and under substantial burden almost entirely outside of the WIOA system. In addition to the data quality issues we discuss above, a number of infrastructure considerations necessitate national linkages:

- While federal resources enable data sharing between states—for instance, the State Wage Interchange System (SWIS)—in practice it can be challenging to use those systems for anything beyond basic reporting. A 2019 report from the National Skills Coalition's Workforce Data Quality Campaign notes, "It's more difficult for states to use SWIS to conduct research and evaluation than it is to use the system for reporting. In order to use wage data for research and evaluation, each state from whom data is requested must consent to share it." Moreover, this data is generally difficult for other stakeholders such as providers to analyze granularly.<sup>18</sup>
- Outside of SWIS, state data sharing is dependent on direct agreements, posing substantial challenges for capacity. Today, only about 1 in 5 states have workforce data sharing agreements with other states for research purposes, according to a 2021 report from the National Association of State Workforce Agencies.<sup>19</sup> The survey also found that more than a third of states reported their staff research and data capacity as inadequate.
- As a 2020 Department-funded review of WIOA performance accountability standards found, "Title I respondents from two-thirds of states said that providers either could not or would not provide them with the required performance data—or the data needed to pull performance data—for multiple reasons," particularly with regard to non-Title I participants.<sup>20</sup> The Department must take action to address this issue, including making the process easier to navigate. As this 2020 report also notes, providing easier accessibility to data matching could be a strong solution: "Nine states persuaded providers of the value and feasibility of collecting participant Social Security numbers (SSNs) and matched those numbers with wage data to calculate performance results. Four states and 10 local areas worked closely with providers to assist them with filing applications and submitting performance results. And, four states coordinated with state and national higher education agencies to obtain performance data."
- The current system makes it incredibly difficult for workforce development providers that do not receive WIOA funding to assess and report on their outcomes, even when they seek to do

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<sup>18</sup> Leventoff (2019), "State Wage Interchange System: Better data for stronger workforce programs," National Skills Coalition, <https://nationalskillscoalition.org/wp-content/uploads/2020/12/NSC-SWIS-Booklet-MR-1.pdf>.

<sup>19</sup> Chocolaad et al. (2021), *Evidence-Building Capacity in State Workforce Agencies: A COVID-19 Pulse Survey*, National Association of State Workforce Agencies, <https://www.naswa.org/system/files/2021-03/evidencebuildingcapacityinstateworkforceagencies-acovid-19survey.pdf>.

<sup>20</sup> Mack and Dunham (2020), *Performance Accountability, Eligible Training Providers, Labor Market Information, and Evaluation Requirements Under WIOA*, Mathematica Policy Research, prepared for U.S. Department of Labor, <https://mathematica.org/publications/performance-accountability-eligible-training-providers-labor-market-information-and-evaluation>.

so, stifling innovation and making it difficult for effective organizations to demonstrate their value. Many of these organizations have found it difficult to work with states, which are already overburdened with regard to WIOA reporting requirements. One America Forward Coalition member, for example, has explored paying credit reporting agencies to assess outcomes for their participants.

We recognize that WIOA bans the development of a “national database of personally identifiable information on individuals receiving services under title I or under the amendments made by title IV.”<sup>21</sup> However, we believe that providing access to national data linkages would not run afoul of this ban—as the College Scorecard had accomplished in the Higher Education Act Title IV context despite a similar ban.

## **II. Recommendation: Create National Employment Metrics System**

We appreciate the Department’s recent efforts to address this challenge, including the ongoing pilots in Indiana and Virginia. Moving forward, we urge the Department to move ahead with planning for a new system leveraging linked federal administrative labor outcomes data on participants’ earnings and employment through a partnership with other federal agencies. Potential partners include the Internal Revenue Service (IRS), with regard to longer-term annual earnings and employment data; the Department of Health and Human Services Administration on Children and Families, with regard to quarterly earnings data in the National Directory of New Hires; and the Census Bureau, which holds quarterly earnings reported by state unemployment insurance systems and annual income data from the IRS.

We recommend that the Department take lessons from the College Scorecard, while recognizing the necessity of tailoring resources to local contexts and needs in partnership with states, localities, tribal governments, and other key stakeholders. We think it makes sense for the Department to publish these data, building on the existing investments in TrainingProviderResults.gov, while tailoring the system’s output to support states, tribes, and local jurisdictions and their partners in leveraging these data for locally-relevant systems.

As a first step, we suggest that the Department partner with a handful of states and workforce development providers to pilot this model, leveraging linked federal administrative data on participants’ earnings and employment through a potential partnership with other federal agencies. We also urge the Department to continue its efforts to engage the field regarding the system’s design, both in terms of its ultimate utility and technical aspects, and to proactively seek participation among the innovative providers that the current WIOA system does not sufficiently support.

As the Department develops this system, we also strongly recommend it identify and leverage funding sources to support its internal capacity, as well as that of partners such as pilot States and providers. In addition to leveraging internal sources of funding, we suggest that the Department prioritize funding for related efforts in forthcoming grant cycles for the Workforce Data Quality Initiative grants.

Once complete, we propose that design elements of this new national metrics system should include the following elements:

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<sup>21</sup> See Workforce Innovation and Opportunity Act Sec. 501(b).

*Security and privacy.* Security and privacy should be the starting point for any new data linkage system. We propose that the Department leverage the most up-to-date, secure privacy-protecting technologies to perform data linkages:

- *Secure linkages leveraging cutting-edge privacy-protecting technologies.* States and/or participating organizations would send participant data (primarily Social Security Numbers) to one or more federal agencies that hold income and earnings data in a secure manner, prospectively in partnership with a qualified data intermediary. These federal agencies and/or intermediaries could merge participant data with income and earnings data and report out aggregate employment statistics (e.g., average earnings of a participant cohort one year after program completion). Federal agencies that fund the grants would not need to touch the data that would be merged.
- *Qualified data intermediaries.* One or more nonprofit data intermediaries that meet federal privacy and security standards could prospectively facilitate the linkage between participating organizations and federal agencies. These intermediaries would: (1) set up standardized data-sharing agreements for use by federal agencies that hold employment data on individuals (i.e., Treasury, ACF, Census) and grantees or providers that hold participant data; (2) format participant data to be merged with federal tax and earnings data; and (3) send the formatted data to data-holding federal agencies to create aggregated outcome statistics. States would not necessarily need to provide participant data if providers are able to submit these data directly to the intermediary.

*Expanded data availability.* As we detail above, it is essential that this system dramatically expand the availability of data so jobseekers, navigators, government agencies, policymakers, and other stakeholders across the system have information they need to make good decisions:

- *Strengthen data reporting.* The proportion of programs with no earnings or employment data available renders TrainingProviderResults.gov largely unusable for jobseekers looking to identify programs likely to lead to sustainable careers. It seems unlikely that the incredible number of programs with no published data in many key fields, such as costs and earnings, is solely due to suppressed cells because of small n-sizes. The Department must act to ensure all ETPs are in fact reporting as required under WIOA, including for outcomes on all participants.
- *Reduce number of programs with suppressed data.* We also strongly recommend that the Department reconsider its suppression rules in light of new techniques to report on programs with relatively low n-sizes. While the Department’s guidance has discussed principles around suppression, we are not aware of particular methodology that is public and believe implementation varies across states. The State of Wisconsin, for instance, reports outcomes for programs with n-sizes above 7.<sup>22</sup> Last year, the Urban Institute published an authoritative report laying out several solutions to n-size challenges in the context of Higher Education Act programs.<sup>23</sup> These recommendations include pooling multiple cohorts’ data and rolling up small programs delivered by providers into a higher Classification of Instructional Programs (CIP) level. Given the efforts the Department has undertaken to align WIOA program reporting in

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<sup>22</sup> Wisconsin Department of Workforce Development (2020), “Wisconsin’s ETP Reporting and Publishing Procedure,” <https://dwd.wisconsin.gov/wioa/policy/07/07.7.2.htm>.

<sup>23</sup> Blagg et al. (2021), *The Feasibility of Program-Level Accountability in Higher Education: Guidance for Policymakers*, Urban Institute, <https://www.urban.org/sites/default/files/publication/103634/the-feasibility-of-program-level-accountability-in-higher-education.pdf>.



partnership with the Department of Education, these recommendations are equally applicable in the WIOA context. Similarly, the National Center on Education Statistics has published extensive guidance on setting n-sizes in the context of K-12 accountability reporting.<sup>24</sup>

- *Report on participant demographics.* This new system must report on the demographics of programs' participants to enable the most basic analysis of whether and how WIOA programs are serving participants equitably. The College Scorecard, for example, provides data on participants' race and ethnicity; socioeconomic status as measured by Pell grant receipt; and enrollment status. As we note above, the Department already requires ETPs to report on demographic data such as age, race/ethnicity, and barriers to employment (e.g., low-income status, homeless individuals or runaway youth). It is essential to report this demographic data to assess programs' outcomes in the context of their populations served—potentially, if necessary, rolled up across multiple program cohorts—and to do so in alignment with common WIOA definitions, such as the definition for “individuals with barriers to employment.” If that reported data is not trustworthy, the Department must act to ensure its quality.
- *Expanded reporting on labor market outcomes.* As a starting point, the Department should publish the fourth-quarter earnings data that ETPs are already required to report—only second-quarter earnings data is available today. Moreover, the Department should take advantage of federal data linkages to expand the scope of reporting beyond a single year—at least three years post-exit—to offer a better assessment of whether ETPs are helping their participants achieve economic mobility. New Jersey's scorecard, for example, already provides earnings and employment data for participants up to two years post-exit. DOL should also consider providing information about participants' incomes *before* entering the program to provide a better estimate of programs' impact, which national labor market outcomes data could help provide.
- *Support program integration.* We also strongly recommend that the Department build in ways to support integration of WIOA with other federal workforce funding streams and benefits programs, such as Reemployment Services and Eligibility Assessment (RESEA) services, Supplemental Nutrition and Assistance Program (SNAP), housing benefits, and Temporary Assistance for Needy Families (TANF). This data would be instrumental to facilitate case management and provide a broader understanding of the participants programs serve. Currently, the lack of integrated data systems is a major barrier to delivering effective services, blending funding streams, and supporting continuous improvement.<sup>25</sup>
- *Enable participation from interested non-WIOA workforce development providers.* In many jurisdictions, the process to become an ETP is overly cumbersome and lacks sufficient consideration of programs' current outcomes before adding them to the list—it is too difficult to distinguish low-performers from innovative, highly-effective programs. The Department should enable workforce development programs not currently participating in WIOA to participate in reporting, in order to assess their program outcomes through this new system and demonstrate their value. A number of America Forward Coalition members have actively sought to assess their labor market outcomes despite considerable effort and expense required – a sharp contradiction from the many ETPs that appear to have submitted data that is incomplete.

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<sup>24</sup> Seastrom (2017), *Best Practices for Determining Subgroup Size in Accountability Systems While Protecting Personally Identifiable Student Information*, Institute of Education Sciences, <https://nces.ed.gov/pubs2017/2017147.pdf>.

<sup>25</sup> See Dunham et al. (2020), *Change and Continuity in the Adult and Dislocated Worker Programs under WIOA*, Mathematica Policy Research, [https://www.dol.gov/sites/dolgov/files/OASP/evaluation/pdf/ETA\\_WIOAStudy\\_AdultDW.pdf](https://www.dol.gov/sites/dolgov/files/OASP/evaluation/pdf/ETA_WIOAStudy_AdultDW.pdf).

*Improve usability for key stakeholders.* The new system should include components that provide substantial value for all participants in the system:

- *Local labor market information.* The Department should provide resources to help states, tribes, and local boards tailor data resources to local needs by providing relevant labor market information (LMI). This effort can build on the example of models like Washington State’s ETP tool and Kentucky’s interactive dashboard for local workforce areas,<sup>26</sup> leveraging the Department’s extensive LMI resources.
- *Support for continuous improvement.* In addition to helping participants and navigators assess programs, the Department should provide complementary technical assistance to help board and workforce providers make effective use of these new data resources through ongoing continuous improvement activities, building on its existing TA resources. We need to ensure that this system supports not only accountability and transparency, but also active improvement.
- *Pilot value-added measures.* Moving forward, the Department should also pilot value-added measures that consider not just participants’ outcomes but their growth as a result of participating in their program, helping to counteract incentives for providers to “cream” participants. In the higher education context, emerging research shows that value-added calculations are essential to avoid conflating provider quality and participant characteristic – given the barriers many WIOA participants face, this approach is even more important in the workforce context.<sup>27</sup>
- *Research access.* Finally, the Department should provide for a process to enable researchers to access the system in a secure, privacy-protected manner. Despite the Department’s considerable investments in research on WIOA, the literature is shockingly thin on questions around quality, value, and equity in the system. Emerging technologies, such as those developed by the Coleridge Initiative, are now available to provide for research access while minimizing potential privacy and security risks.

We appreciate the opportunity to respond to this RFI and would welcome a meeting to discuss our recommendations further. We look forward to continuing to support the Department’s critical work in this area.

Sincerely,

America Forward  
Colorado Equitable Economic Mobility Initiative (CEEMI)  
Data Quality Campaign  
Opportunity@Work  
Per Scholas  
Project QUEST  
REDF (Roberts Enterprise Development Fund)  
Results for America  
Social Finance  
Third Sector Capital Partners  
Year Up Inc.

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<sup>26</sup> Kentucky Workforce Dashboard, <https://kystats.ky.gov/latest/KWD>.

<sup>27</sup> See Blom et al. (2020), *Comparing Colleges’ Graduation Rates*, Urban Institute, <https://www.urban.org/research/publication/comparing-colleges-graduation-rates>.