June 24, 2011

OMB Desk Officer for the Department of Labor, Employment and Training Administration
Office of Management and Budget, Room 10235
Washington, DC 20503

Via email: OIRA_submission@omb.eop.gov

Re: Comments on the proposed information collection for High Growth and Community-Based Job Training Grants

I am pleased to respond to the notice in the May 25, 2011 Federal Register asking for comments regarding the Employment and Training Administration (ETA) information collection request “High Growth and Community-Based Job Training Grants.”

As a research professor at the George Washington Institute of Public Policy, I focus on federal policies and programs that support job creation and economic competitiveness. From this perspective, I believe that ETA’s High Growth and Community-Based Job Training Grants, properly invested, address underinvestment in skilled worker training and so improve the capacity of labor markets to meet business needs for skilled workers. The collection of information needed to assess grantee and program performance is an important part of grant program operation, enabling an understanding of the return on the federal investment and identification of opportunities for improvements in program operations. Consequently, I am pleased to support ETA’s request to collect information concerning the High Growth and Community-Based Job Training Grants.

That said, I have three recommendations regarding the information collection request. The first is that each row of section 2c (including 2c.i and 2c.ii) of the quarterly performance report (ETA-9134) include information on quarterly wages earned by the workers identified. Having wage totals would allow determination and analyses of the labor market value of investments made through the High Growth and Community-Based Job Training Grants. The wage data are obtainable through the same resource used to determine number employed, the Common Reporting Information System managed by the State of Kansas. In particular, I recommend that for columns A, B, and C in section 2c each have two subcolumns, number of workers and total wages earned.

Second, I recommend that the High Growth and Community-Based Job Training Grants general quarterly reporting forms and instructions, Section D, subsection D.1, part E (p. 9), the last sentence of the first paragraph be amended to read:

These strategies include (a) developing and disseminating career awareness information; (b) effectively utilizing recently released labor market and other workforce information to adjust training program offerings as appropriate; (c) developing adequate numbers of
qualified instructors, such as through train-the-trainer and professional development activities; (c) (d) identifying occupational competencies and developing competency-based curricula; (d) (e) developing applied learning and clinical experiences, such as internships or the use of simulations; and (e) (f) developing innovative learning models and environments and ways of structuring the education process, such as distance learning and blended-learning models.

While High Growth and Community-Based Job Training Grant applicants may have used workforce information to identify the initial need for training, local labor markets can change significantly between the time of the proposal and the implementation period. Consequently, I believe that, to build capacity, grantees should be asked to regularly review updated workforce information (e.g., occupational projections by state, the Conference Board Help Wanted OnLine) and adjust training efforts accordingly. I think such action is particularly desirable as ETA invests over $30 million annually in state LMI agencies to produce workforce information; training grantee use of ETA-funded workforce information increases the return on investment in both forms of federal funding. Most important, adjusting training efforts in light of new information should result in improved trainee outcomes.

Third, I recommend that OMB, as a condition of clearance, direct ETA to prepare a report for OMB on the potential for use of statewide longitudinal data systems (SLDS) to improve common performance measures reporting by ETA grantees. Since 2005, the National Center for Education Statistics (Department of Education) has invested a half billion dollars in SLDS through the SLDS Grant Program; aims include tracking the workforce outcomes of secondary and postsecondary education and training programs. In 2010, through the Workforce Data Quality Initiative (WDQI), ETA provided over $12 million to 13 state labor market information agencies to facilitate the linkage of workforce data to SLDS. The May 17, 2010 Federal Register notice inviting proposals for WDQI funds indicated that:

At a minimum, the data systems should include disaggregated individual record data for the following programs: (1) WIA Title I, (2) Wagner-Peyser Act, (3) Trade Adjustment Assistance program data, (4) UI wage record data, (5) UI benefit data including demographic information associated with UI benefit payments, and (6) linkages to existing State education agency longitudinal data. Applicants are also encouraged to include data from other workforce programs such as Vocational Rehabilitation or RA programs.

A second round of WDQI funding is expected to be announced this summer. Further, efforts are being explored to link SLDS to CRIS and/or the Census Bureau’s Local Employment Dynamics Program, both of which have access to employee UI wage records nationwide. In light of the substantial breadth of education and workforce data intended to be in SLDS, and the substantial amount of funds invested in SLDS by taxpayers, I believe it quite desirable for ETA to ascertain the extent to which SLDS can be leveraged as a resource for grant reporting, particularly regarding common performance measures. Consequently, I recommend that OMB direct ETA to provide such an assessment to OMB.
Thank you for your consideration of my support and suggestions regarding information collection for ETA’s High Growth and Community-Based Job Training Grants. I look forward to your decision.

Sincerely,

Andrew Reamer  
Research Professor