

ETA Response to Draft Report

U.S. Department of Labor

Assistant Secretary for
Employment and Training
Washington, D.C. 20210

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MEMORANDUM FOR: ELLIOT P. LEWIS
Assistant Inspector General
Office of Audit

FROM: JANE OATES *Jane Oates*
Assistant Secretary
Employment and Training Administration

SUBJECT: Response to the Office of the Inspector General's Audit,
*Changes Can Provide ETA Better Information on
Participants Co-Enrolled in Workforce Investment Act and
Wagner-Peyser Programs, Audit Report 03-12-004-03-390*

The Employment and Training Administration (ETA) appreciates the opportunity to provide a response to the Office of the Inspector General's (OIG) audit report on participants co-enrolled in Workforce Investment Act (WIA) and Wagner-Peyser Programs. We acknowledge the time and effort that the OIG spent examining data of WIA participants who were co-enrolled in the Wagner-Peyser Employment Service. As stated in the report, co-enrollment of participants is a voluntary tool for states to use in the design of their service delivery. As it is not statutorily or regulatory based, ETA has not issued specific guidance on co-enrollment. The guidance mentioned in 2006 (Training and Employment Guidance Letter 17-05) was focused on performance measures.

Recommendation 1: Work with workforce investment stakeholders in developing a plan for a comprehensive unified reporting and performance measurement system.

ETA Response: It should be noted that there is no requirement under WIA or Wagner-Peyser regulations that requires that a reporting mechanism be developed to capture "the reality brought about by co-enrollment." As acknowledged in the report, ETA views co-enrollment practices as a voluntary tool available to states to enhance service delivery.

That being said, ETA appreciates the recommendation that it work with its stakeholders to develop a comprehensive performance accountability system. However, a significant barrier to implementation of such a system is availability of resources. An update on the latest developments relating to a streamlined reporting system (i.e. which states are currently participating, how the Enterprise Data Reporting and Validation System can further assist states wishing to implement, etc.) will be provided in an upcoming Training and Employment Notice (TEN) which will be disseminated to all stakeholders by December 31, 2012.

Recommendation 2: Identify and share practices used by State Workforce Agencies (SWAs) to address the challenges of efficiently providing services by staff funded under WIA and Wagner-Peyser at the American Job Centers.

ETA Response: ETA will encourage states to share the information without making a value judgment. Since co-enrollment is done on a state-by-state basis, ETA notes that what works well in one state or area may not work well or be appropriate in another. However, ETA will share state comments regarding why co-enrollment is a beneficial practice. These comments will be shared in the TEN referenced in recommendation 1 above.

Recommendation 3: Remind SWAs that when co-enrolling it is important to ensure all American Job Center staff can access information on services provided to participants to avoid duplication of services.

ETA Response: Although duplicative services between WIA and Wagner-Peyser services cannot be identified from Workforce Investment Act Standardized Record Data alone, services which may seem redundant across funding streams may be necessary to best facilitate services to each individual (i.e., one participant may need staff-assisted job search assistance numerous times if he/she is unfamiliar with a potential new career path, a desired geographic area, or technology). However, ETA recognizes that duplicative services which result in the same outcome are not the most efficient use of funds and American Job Center staff time. ETA will use the opportunity of the aforementioned TEN to remind states of the importance of avoiding duplicative services across multiple funding streams.

Thank you again for the opportunity to comment. If you have any questions, please contact Luke Murren at 202.693.3733 or Murren.luke@dol.gov.