COMMENTS AND RESPONSES

I.   Performance Reporting - General

1. **Comment:**
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    Sponsoring Org:
    Submittal method: e-mail
    Date comment submitted: 8/19/2019
    Date comment received: 8/19/2019

    1) What impact, if any, would the addition of the Apprenticeship Employer Record Layout (AELR) to the PRIL [sic] have on the annual ETA-9169 report? The ICR mentions changes the quarterly ETA-9173. Unless I overlooked it, I saw no mention of the ETA-9169.

    2) Approximately how many additional fields will be added to the PIRL?

    3) Will the information intended to populate additional PIRL fields be information currently collected by field staff, typically already in a WIOA case management (MIS) system or will data not currently required for collection be required if the proposed PIRL changes are approved?

    4) How soon would the proposed changes go into effect? With the continuous evolution of WIOA, WIOA reporting, and the PIRL edit checks in the DOL WIPS reporting system, it is my opinion such a change should go into effect no sooner than Q1 of PY20.

    5) Would the AELR leverage existing PIRL fields? Will it be a series of entirely new fields to the PIRL, simply tacked on to the existing fields and expanding the total number of fields in the PIRL?

    6) Will there be a grace period for the reporting of AELR information?

    Agency's Response, September 2019:
    1) There is no impact on the ETA-9169, which is the annual report for WIOA participants. Should any Registered Apprentice enrolled in an ETA grant with apprenticeship-component/s as a primary focus of that grant be co-enrolled in any WIOA or other Title I activity, that individual would be captured through the standard WIOA enrollment process.

    2) There are 19 additional data elements specific to grants with apprenticeship activity, which will be collected in addition to existing data elements that align with greater DOL data collection requirements, contained within the PIRL. There are definition and code-value changes to elements 907 and 931 in addition to adding apprenticeship-program grants to the required elements. An "R" in the Apprenticeship column on the final approved PIRL will indicate which elements ETA grants with significant apprenticeship components as a primary goal of the program (Apprenticeship Grants) will be required to collect.

3) The information is pertinent to grants with significant apprenticeship components much in the same way that the ReEntry, H-1B or YouthBuild Programs have a separate, dedicated section used for reporting on those grant programs, and staff for those programs collect the elements. This request adds 19 new data elements specific to grants with significant apprenticeship components. Some of the information for some of the new elements may already be collected, but would only be applicable to those co-enrolled through WIOA-funded programs versus the entirety of individuals considered participants in an apprenticeship grant where co-enrollment was not a required activity on which the grants to which this collection request applies.

4) There are many variables in the development process, DOL/ETA does not anticipate the implementation of apprenticeship-centric grants into WIPS prior to FY2020 Q3.

5) No, a request of the supporting documentation and subsequent visual analysis would demonstrate that the proposed Apprenticeship Employer Record Layout has no direct impact on or relation to WIPS nor the PIRL as it does not contain participant-level data. For programs which could require this, there would be no grace period, as the information should already be being gathered by a prime grantee during the course of the regular dally grant activities. This document merely provides a reporting vehicle for required grant related activity, where required by and applicable to grants with significant apprenticeship components.

6) No, a request of the supporting documentation and subsequent visual analysis would demonstrate that the proposed Apprenticeship Employer Record Layout has no direct impact on or relation to WIPS nor the PIRL as it does not contain participant-level data. For programs which could require this, there would be no grace period, as the information should already be being gathered by a prime grantee during the course of the regular dally grant activities. This document merely provides a reporting vehicle for required grant related activity, where required by and applicable to grants with significant apprenticeship components.

Action: None

2. **Comment:**

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Sponsoring Org:
Submittal method: e-mail
Date comment submitted: 8/20/2019
Date comment received: 8/20/2019

In many states the apprenticeship programs are not contained within the same Division or even the same Department as the workforce system therefore, great consideration should be given to the reporting burden that would be created by requiring participant and employer data for apprenticeship grants be maintained by both the apprenticeship program (in RAPIDS) and the workforce program (in their own, varied, MIS systems). If the required data elements selected

go beyond the scope of what is collected in RAPIDS, then that additional data will have to be maintained within the workforce MIS, requiring duplication of data entry efforts for each participant as participant-level records would have to be maintained in both systems in order to produce the appropriate reporting files for upload to WIPS. Additionally, in order to generate, submit, and certify the new, proposed Apprenticeship Employer Record Layout to ETA on a quarterly basis, all data elements required for that report, which are currently held in RAPIDS will have to be duplicated in the Workforce MIS either by directly entering them into the Workforce MIS or exporting them from RAPIDS on a regular basis and uploading them into the Workforce MIS for report generation and upload into WIPS. This transfer of and/or duplication of data allows for the potential loss of data and/or data integrity during export/import, data entry errors from duplicative data entry and data management in multiple systems, and the possibility of out-of-date data at any given time in at least one (1) of the systems, if data entry is managed by export/import from the primary system to the secondary on a scheduled basis. This type of work creates the necessity to maintain the same data in multiple locations and manage simultaneous records for the same participant which opens up the data to errors, miscoding, data entry conflicts between systems, report errors, and other issues that corrupt the integrity of the data. Data should be maintained for all activities and interactions funded for a grant participant in a single system from which reporting can be generated in order to ensure the most accurate data is being maintained and reported regularly. In order to ensure the integrity of the data and lessen the burden that managing the same data in multiple systems simultaneously creates, the Registered Apprenticeship Partners Information Data Systems (RAPIDS) should be setup for discretionary grants to collect all required data elements for each Apprenticeship Grant, both for the Participant Individual Record Layout (ETA-9172) required data elements and the Apprenticeship Employer Record Layout required elements. For each quarter ending report, RAPIDS should generate an extract file compliant for upload into WIPS for each of these two (2) required quarterly reports. The Participant Individual Record Layout (PIRL) for Apprenticeship grants should be setup in WIPS similar to the current H1B PIRL requirements in that the grants have their own schema the includes only the required data elements collected for that grant(s) and an individual WIPS login/program upload location should exist to upload the Apprenticeship Grant PIRL (and Employer Record Layout) schemas. WIPS can then generate the ETA-9173 for the Apprenticeship grant(s) from that uploaded data as it currently does for all other programs.

Apprenticeship programs are often self-sufficient and do not rely on federal funds to operate. Many programs are not governed by laws requiring registration, unlike in the construction trades. The list of required data elements for collection should be developed with this in mind. Apprenticeship programs in non-traditional trades are still in the early development stages and it is important that these programs do not get over burdened by reporting requirements as the risk for them to leave the Registered Apprenticeship system is high. Therefore, identification of required data elements for the Apprenticeship Grant PIRL layout should focus on inclusion of only the most useful data elements; the elements currently collected in RAPIDS could be included in the individual and/or employer schemas, as this data is already being collected and stored. If additional data fields are to be added to what is already collected in RAPIDS these additional data fields should be minimal so as not to increase the burden to participants, employers, grantees, and/or states and any additional data fields should be added into RAPIDS to ensure collection in concert with all other data pertaining to that individual's participation in the Apprenticeship Grant.

Agency's Response, September 2019: This existing performance reporting system (WIPS) is being further developed to support ETA grants with significant apprenticeship components as a primary goal of the program (Apprenticeship Grants), and the reporting of activity associated with those grants. Recipients of these grants include, but are not exclusive to, state entities (be they related to the workforce entity in a state or otherwise) who may also operate programmatic activity supported by other funds in addition to grant funds. This reporting function is exclusive to grant activity only, and is in keeping with the majority of the other DOL/ETA grant programs.__The Registered Apprenticeship Partners Information Data System (RAPIDS) is a voluntary case-management system for the use of employer/sponsors of apprentices rather than grantees. Grantees are often not an employer/sponsor but another organization entirely. RAPIDS was not designed for grant-reporting purposes, nor has the regulatory authority at the Federal level to require employers/sponsors to utilize it in whole or in part, nor with any particular frequency mandate. As such, no grantee should rely on RAPIDS for grant-related performance reporting for while RAPIDS is a good case-management tool for those sponsors and states who choose to utilize it, RAPIDS does not allow for the granularity of integrated tracking that grants related performance reporting through the WIPS system allows. This ICR contains required data elements to be utilized with quarterly reporting by grantees, which may or may not be state affiliated. Additionally, for those grantees who are state entities, participants for grant-reporting purposes are necessarily a sub-set of statewide overall apprentices, rather than the number as a whole within a State. Programs which will require reporting to include overall statewide apprenticeship numbers will necessarily require those types of information be submitted through narrative report. Apprenticeship Employer Record Layout data elements are not gathered through RAPIDS for other than those entities which are participating in Registered Apprenticeship programming.

Action: None.