

ICR REFERENCE #
OMB Control No. 1205-0521
60-Day FRN Public Comment and Agency Response

Department of Labor

Information Collection Request

**Workforce Innovation and Opportunity Act (WIOA)
Performance Reporting System**

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

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Executive Summary (Overview of Document)

The Department of Labor (DOL) published a 60-day Notice in the Federal Register (FRN) seeking public comments concerning proposed extension for the authority to conduct the information collection request (ICR) titled, “DOL-only Performance Accountability, Information and Reporting System.” on June 20, 2024 (OMB ICR Reference Number 1205-0521).

This document provides a summary of the 30 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 5 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 (ETA-9172)			
1.	California recommends adding a PIRL data element to indicate if the individual is an RESEA participant.	The Department has determined this change is not necessary, as RESEA participants are indicated through reporting in PIRL 401.	1
2.	(See link for full comment) Comment summary - We request DOL add two new PIRL data elements to the PIRL Reporting Specifications: a) Language Preference (Selection of a language) (Required for Wagner-Peyser) (The PIRL would be fed with the Primary Language field currently collected in our WSMIS) b) Do you need translation assistance? (Yes, No) (Required for at least Wagner-Peyser) (The PIRL would be fed with the Do you need translation assistance? field currently collected in our WSMIS) Comments\Already Categorized\WA State Comment on suggested new elements.pdf	The Department thanks the commenter for this suggestion and declines to make this addition. Collecting this information in case management systems is allowable and a best practice, but it is not necessary for this information to be reported to the Department. PIRL elements 803, 804, and 805 provide sufficient information to understand the nature of these barriers and adding new elements would increase the reporting burden.	1
3.	The numerous changes to the ETA 9172 will cause burden to states to update their case management systems and to the local models, states created. The field listing and results for some fields are different with the added options and this will effect state models, like gender, long term unemployed, etc. Why make changes when technical assistance support for models has ended and states require assistance.	While the collection of additional information will eventually enable states to add such variables into future iterations of their models, the changes proposed in this amendment do not impact states' ability to continue to implement the same variables in the same way as they are currently using in their local models. For example, while gender is being added to the collection, the sex variable will still be collected and usable in models. Similarly, while additional code values are being added to the long term unemployed variable, none of	1

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		those code values will be valid options for the WIOA formula programs and therefore will not have an impact on the local models developed for local areas under WIOA title I.	
4.	The reporting process is cumbersome and often time unclear expectations are placed upon grantees on how to report on PIRL data elements. Much of the information that needs to be reported is very difficult to collect and does not pertain to apprentices and pre-apprentices.	The Department appreciates the comments and concerns regarding the registered apprenticeship data collection. Much research and thought has been given to the selection of each PIRL data element. In fact, 31 data elements were removed from the apprenticeship PIRL schema during the last update for this ICR. The Department continually looks for ways to improve and streamline the data collection process, keeping in mind any burden that may be placed on our grantees and other registered apprenticeship stakeholders.	1
5.	The proposed changes would require significant case management system upgrades to capture the required data, coordination with other agencies for data matching and updates to the state reporting system logic and schema. As these are significant updates, an extended implementation timeline would be necessary.	See Response PIRL #3	1
6.	While it is understood that the current ICRs expire June 30, 2024, and the proposed changes that are ultimately approved will essentially take effect July 1, 2024, we ask that consideration be given to delaying any immediate plans for grantees to incorporate these changes into their quarterly and/or annual data submissions. Some of the suggested modifications necessitate system changes that can take grantees a minimum of a year to design and implement due to capacity issues including, but not limited to, information technology staffing availability and functional release schedules. It is also for this reason we ask for consideration in delaying implementation of edit checks in relation to these revisions to prevent grantees having to manipulate and potentially remove records from their data submissions in order to meet reporting requirements.	See Response PIRL #3	1

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7.	Evaluate whether the proposed collection of information is necessary for the proper performance of the functions of the Agency, including whether the information will have practical utility; • WI-DWD-DET encourages DOL to consider each update's impact not only in reporting, but from the moment data is being collected and through the lifecycle it is stored and reported. • WI-DWD-DET encourages DOL to consider how each update may discourage participants and create unnecessary barriers. • WI-DWD-DET encourages DOL to consider if each update provides enough value to offset the burden. Evaluate the accuracy of the Agency's estimate of the burden of the proposed collection of information, including the validity of the methodology and assumptions used; • Whenever there are PIRL or other reporting updates, changes to forms, management information systems, databases, batch jobs, etc. all need to be coordinated and implemented. For most updates, training to staff and a shift in data collection methods must occur. Coordination between different work areas need to be planned out (business leads, project managers, developers, administrators, etc.), and budgets much be approved ahead of time. It is difficult to properly estimate the burden until all work areas are available to review the changes in detail together.	See Response PIRL #3	1
8.	There is an opportunity to require the collection of more extensive demographic data by expanding available options. This would provide more usable data that can be applied to programmatic design and decision-making. DOL is already taking this step with	While the Department has elected to collect the race categories in this collection using the aggregate groupings defined by the Office of Management and Budget (OMB) the Department does encourage grantees to collect this information at a more granular level	1

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	gender identity and sexual orientation. Clarity around racial demographics is missing from the latest changes. Specifically, expanding the race options listing to include more groupings. The Black/African American and Asian categories are too broad and lump together a wide range of communities with very different needs. This makes it difficult to see the communities our system serves and to address their unique needs. The groupings should be disaggregated to more accurately reflect the distinct peoples included. States that provide a required data system (such as Washington) tend to focus on the required PIRL elements in system implementation/maintenance. By making more specific demographic collection a requirement, DOL can help local areas access richer, more usable data.	when possible, as the commenter is correct that the subpopulations within these groups may face very different needs. The OMB has issued information on how to collect this more granular level of information and aggregate it into these broader categories, and the Department will provide additional technical assistance to discuss this practice in greater detail.	
9.	The creation of the new race field, and the separation of other fields (Asian) to feed this will greatly impact models that states have built. We cannot separate older data out since these fields are self-disclosed. Therefore, no historical data will exist if the new field is created.	The new race field, “Middle Eastern and North African”, is a population that under the previous definition was reported in the “White” category. During the period of transition for building up enough historical data to use this new field in statistical models, these two groups should be aggregated back together in order to maintain alignment with historical data until such time as sufficient data are collected on the “Middle Eastern and North African” category that it is usable on its own.	1
10.	All elements clarifying "Registered" This is a helpful distinction.	The Department appreciates this comment in support of the change.	1
11.	PIRL 201 - Sex: Asking an individual who has transitioned from the sex they were assigned at birth to acknowledge and affirm that they have transitioned and to identify their sex assigned at birth can be traumatizing to an individual requesting services and also can expose the individual to discrimination and harassment. It is not necessary to ask someone which sex they were assigned at birth in order to receive culturally appropriate services, even if the option is	WIOA Section 189 (h) requires that participants served by WIOA have not violated section 3 of the Military Selective Service Act, which requires that US citizens or immigrants who are assigned male at birth must register for the Selective Service System. The Selective Service System has clarified that US citizens or immigrants who are assigned male at birth and changed their gender to female are still required to register, while individuals who are assigned female at birth and changed their gender to male are not required to register.	1

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	given not to self-identify.	Unless the Selective Service System makes changes or updates their guidance, anyone assigned anything other than male at birth is interpreted as not being required to register. WIOA section 116 also requires that WIOA Annual Reports be disaggregated by Sex. Therefore, a participant’s sex assigned at birth is something that is required to be asked of a participant. Additionally, congressional appropriations, like the 2021 Appropriations, have mandated certain programs that use this collection be able to disaggregate by gender identity. This, in combination with the need for cross-program definition alignment and the likelihood that such requirements will continue or expand has led the Department to make changes to ensure accurate and distinct collection of elements related to sex and gender identity. The Department notes that individuals must be given the option to choose not to disclose for these elements.	
12.	DE201 – language does not align ("intersex" vs. "other"). It is also unclear in ETA-9170 if the intent is to capture "sex assigned at birth." Collecting this information as identified in ETA-9172 (sex assigned at birth) could be invasive and off-putting to some individuals.	See response to PIRL comment #11.	
13.	In relation to Data Element 201 – Sex (WIOA), is there more guidance regarding how intersex works with Selective Service?	See response to PIRL comment #11.	
14.	PIRL 201 Sex (WIOA) versus/and XXXX - NEW Gender Identity For our reporting and data collection purposes, we only collect gender as expressed by the apprentice(s). Particularly for youth apprentices, this can be a sensitive matter that may cause challenges in asking. Adding another field to know sex at birth versus gender as expressed seems duplicative and increases the burden of data collection at apprentice enrollment and for	See response to PIRL comment #11.	

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	reporting.		
15.	Sex, field 201: Addition of Intersex will affect state created Models that have been developed using this field. Only 1.7% of population are born with intersex traits. In addition, the 9173 is only showing Male and Female counts. So why add the new category	While intersex is not a very common sex assignment at birth, it is a category that is assigned in many states, and therefore is necessary to ensure accurate data when collecting sex as assigned at birth. While this additional category is not in the QPR, the department will consider adding this information to the QPR in the future once there has been time to implement and analyze the collection.	1
16.	PIRL 201 - Sex is needed to determine selective service compliance whenever the value of this field is 1. If an individual identifies as 3=intersex, how do you determine compliance for Selective Service? Also, NC currently uses 201 - Sex to import and match with other systems that will not allow a new option. Will UI systems have this same change?"	See response to PIRL comment #11. This collection does not change any requirements for UI systems.	1
17.	Will Gender Identity and 201-Sex both be used to determine 1611 Non-trad employment? If individual chooses different values for each field, will one field be considered the primary determination?	Non-traditional employment is determined based on the individual's gender identity.	1
18.	PIRL Element 201 - Sex, PIRL Element NEW - Gender Identity and PIRL Element NEW - Sexual Orientation: Diversity, equity, inclusion, and accessibility must be a priority within the workforce system. Aiding the success of underrepresented populations in the workforce is one of the underlining principles of WIOA. It is also not disputed that data collection on sexual orientation and gender identity provide significant insight into who the workforce system is serving. However, this data is not needed for determining eligibility, can be seen as intrusive and could disenfranchise the participant. The system needs to measure the value of additional data against the negative impact on the customer. States and	In addition to the potential analytical value of collecting this information that is noted by the commenter, the Department also notes that Gender Identity is also required for certain DOL programs through the 2021 appropriations, in addition to the requirements described in the response to PIRL comment #11.	1

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	grantees have already been asked why such a large portion of participants choose not to disclose their race. It is mainly because individuals feel it is an invasion. The implementation of these changes will more than likely garner similar results, which will dilute the intended purpose of trying to paint a better picture of who the workforce system is serving. It is, therefore, our recommendation that these suggested changes are not implemented.		
19.	Sex PIRL 201 Tennessee is not in favor of changing or updating this question. Adding intersex /other could have impacts on knowing if the person was required to register with selective service and other negative impacts. These options in the Annual Report do not match the coding for field 201: Male, Female, Intersex, Did not disclose.	See response to PIRL comment #11 and PIRL comment #15.	1
20.	PIRL 201 - DOL proposes to clarify male and female and add Intersex as Code 3, we request that DOL confer with the Selective Service System (SSS) and provide guidance concerning how to proceed in situations where Selective Service registration is checked for program eligibility and individuals indicate "3=Intersex." We know from SSS guidance that proof of registration is required of all individuals assigned male at birth. Is intersex exempt as it is for those assigned female at birth?	See response to PIRL comment #11.	1
21.	Field 201, what is intersex? When I google, it states: the condition of having both male and female sex organs or other sexual characteristics. The ETA 9172 list at Birth. At Birth sex is determined as Male or Female in hospital and not left as unknown. Why the new category, what does this add to reporting. Also per the new 9173 template, Sex is listed as Male or Female, no other options listed.	See response to PIRL comment #15.	1
22.	DE 201 - The changes in the definition of "Sex" to sex assigned at	The Department appreciates this comment in support of the change.	1

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	birth provide some needed clarity, since they match the Selective Service definition and allow us to be sure about whether Selective Service registration is required.		
23.	DE 201 - What is the definition of "intersex"? It should be provided to avoid confusion.	See response to PIRL comment #15.	1
24.	Element 201: This puts things more in line with WIOA registration.	The Department appreciates this comment in support of the change.	1
25.	PIRL 201 - Not sure why the identification of Intersex is valuable to reporting or why they feel the need to identify this at the federal level.	See response to PIRL comment #11 and PIRL comment #15.	1
26.	Consistency in the numbers for responses would be appreciated. For example; elements 202 through 215 1 = yes and 0 = no, but 2904 1= yes and 2= no.	The Department appreciates this comment and accepts this suggestion by revising the “No” code value response from “2 = No” to “0 = No” for PIRL 2904 (In Pre-Apprenticeship Program with an Articulated Agreement). Any affected QPR aggregations and edit checks have also been revised.	1
27.	Several elements are not relevant to youth apprentices (under the age of 18), particularly in-school youth (or the definition needs refinement to understand how it applies to youth). Is there potential for a youth-specific waivers for data, or less required for youth Apprenticeship PIRL? o 300 Veteran Status o 301 Eligible Veteran, Spouse, or Transitioning Service Member Status o 400 Employment Status at Program Entry (WIOA) o 402 Long-Term Unemployed at Program Entry (WIOA)	The Department notes that different PIRL requirements apply to each program but does not grant waivers for specific elements to specific grantees within those programs. The Department recommends grantees with such concerns follow the instructions for all other data elements mentioned (i.e., PIRL 300, PIRL 400, and PIRL 402). Specifically, grantees should select the code value that best fits each participant. For example, when selecting a code value for PIRL 300, the grantee may select either code value = 0 for no, or code value = 9 for status unknown. PIRL 301 (Eligible Veteran, Spouse, or Transitioning Service Member Status) is not a required data element in the PIRL apprenticeship schema, it was checked in error and is no longer checked.	1
28.	In relation to Data Element 301 – Eligible Veteran, Spouse, or Transitioning Service Member, CA suggests changing the value of “4 = Yes, Other Eligible Person” to “Yes, TSM.” Keeping the same code value description but changing the definition and the number	Veterans Program Letter (VPL) 05-24 Jobs for Veterans State Grants Staff Roles and Responsibilities and Coordination with Workforce Innovation and Opportunity Act Services to Veterans, published April 25, 2024,	1

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	from 3 to 4 is confusing.	changed the requirements for Transitioning Service Members (TSMs) to receive DVOP services. As a result, the Department withdraws the proposed addition of TSMs as a separate code value in PIRL 301. The Department proposes the inclusion of eligible TSMs in the definition of code value 3, Other Eligible Person, as follows: Record 3 if the participant is: (a) the spouse of any person who died on active duty or of a service connected disability, (b) the spouse of any member of the Armed Forces serving on active duty who at the time of application for assistance under this part, is listed, pursuant to section 556 of title 37 38 U.S.C 101 and the regulations issued there under, by the Secretary concerned, in one or more of the following categories and has been so listed for more than 90 days: (i) missing in action; (ii) captured in the line of duty by a hostile force; or (iii) forcibly detained or interned in the line of duty by a foreign government or power; or (c) the spouse of any person who has a total disability permanent in nature resulting from a service connected disability or the spouse of a veteran who died while a disability so evaluated was in existence; or (d) a member of the Armed Forces who is wounded, ill, or injured located in a military treatment facility/warrior transition unit or as a family caregiver as defined in 38 U.S.C. 1720G(d) of such wounded, ill, or injured member; or (e) a Transitioning Service Member (TSM) who participated in any part of the Transition Assistance Program (TAP), including self-paced online modules and Individualized Initial Counseling. The department proposes to change the name of PIRL 301 to "Eligible	

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		Veteran or Other Eligible Person" and the code values as follows: 1 = Yes <=180 days. 2 = Yes, Eligible Veteran 3 = Yes, Other Eligible Person 0 = No 9 = Status not known	
29.	301 Eligible Veteran, Spouse, or Transitioning Service Member Status This will be newly required under the proposed revisions. Are there age qualifications for this field? For in-school youth, as an example, could they be considered caregivers for veterans? Our participants would not have served or be the spouse of someone who had served as in-school, high school youth.	The definitions that apply to a “family caregiver” under Data Element 301 are found in 38 U.S.C. 1720G(d).	1
30.	PIRL Element 301 – Eligible Veteran, Spouse, or Transitioning Service Member: The Apprenticeship program is unique from other workforce programs in that the individual is already employed through a connection outside the traditional workforce system. Access to data on the registered apprentices being supported by Apprenticeship program grant funds is only through the ETA-671 Apprenticeship Agreement, which is limited to a basic ‘yes or no’ indicator as to veteran status. Without a change to the ETA-671, the Sponsor or Employer will need to selectively capture this information on individuals becoming registered apprentices only when the Sponsor or Employer is engaging with a Registered Apprenticeship Program grant, which may deter Sponsors from engaging with the workforce system. Therefore, it is our recommendation that the requirement of recording PIRL Element 301 for Registered Apprenticeship Program grants be removed.	The Department appreciates this comment and notes that this element was checked in error. OA-managed apprenticeship grants do not require the collection of PIRL 301 (Eligible Veteran Status).	1

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31.	PIRL 301 - DOL proposes to revise to add transitioning service members (TSM), does DOL plan to add source documentation requirements for TSM in TEGL 23-19 (as it does for eligible veterans) or are staff directed to rely on self-attestation for TSM?	See response to PIRL comment #28. The Department does not plan to revise the source documentation requirements for Data Element 301. As per Veterans Program Letter (VPL) 05-24 Jobs for Veterans State Grants Staff Roles and Responsibilities and Coordination with Workforce Innovation and Opportunity Act Services to Veterans, published April 25, 2024, section VI.A.3 Participant Eligibility and Privacy, states must accept an individual's verbal, written, or electronic confirmation of their eligibility status and experiences as sufficient evidence for referral to DVOP services.	1
32.	Field 301, why is TSM being combined when TSM is a separate field 305. If a person is within 24 months of separation they are not a veterans, just TSM. If within 12 months after separation then they are a veteran.	See response to PIRL comment #28.	1
33.	PIRL 301 and 302: These changes will require programming changes and some additional training about the updates, but this is not a significant change for the program or impact to AJC.	See response to PIRL comment #28.	1
34.	Element 301 - We are supportive of expanding the definition of an eligible veteran to include both family caregivers and transitioning service members as this would allow JVSG to serve a wider range of veteran participants.	The Department appreciates this comment in support of the change. See response to PIRL comment #28 for updates to Data Element 301.	1
35.	Data element 301. Eligible Veteran, Spouse or Transitioning Service Member. Commenter team appreciates these proposed updates. Services to non-veteran on data integrity measures may need updated as services to non-veteran data integrity measure is adversely affected with these Services to non-eligible veterans. (spouse or family caregiver)	The Department appreciates this comment in support of the change. See response to PIRL comment #28 for updates to Data Element 301.	1
36.	Element 301: This change is appreciated for its clarity and	The Department appreciates this comment in support of the change.	1

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	additional recognition of service-related persons.		
37.	Element 302: Where will we be getting the information on the authorized campaign badges? Currently Oregon has a drop-down list for participants to choose their appropriate campaign badge. The text (i.e., coding value 1 in Element #301) means it is or in other words, which makes it sound like no other value in #301 can be used to provide an answer to this element. If e.g., meaning example, were to be used that would make more sense. Also “an” in Record 1 needs to be changed to “a”.	The Department of Defense’s Directives Division issues guidance on authorized campaign badges. Visit https://www.esd.whs.mil/DD/ to access the most updated list.	1
38.	PIRL 303: These changes will have minimal impact on the JVSG program but will require programming changes and training about changes to registration options.	The Department appreciates this comment in support of this change.	1
39.	Data element 303. Service-Connected Disabled Veteran. Commenter team appreciates reporting distinction of Service-connected disability versus "disabled veteran".	The Department appreciates this comment in support of the change.	2
40.	DE 304 - Date of Actual Military Separation Does this question not apply to National Guard or Reserve status since it references "Active"?	It applies to participants who served on active duty in the U.S. armed forces.	1
41.	PIRL 308 and 309: These changes will have minimal impact on the JVSG program and only require minor programming changes.	The Department appreciates this comment in support of the change.	1
42.	DE 308 – Homeless Veteran (Removed in ICR) Will Homeless Veterans that are not in an HVRP program no longer be accounted for or the basis of eligibility for a significant barrier to employment?	DE 308 is redundant with DE 800 Homeless participant, Homeless Children and Youths, or Runaway Youth at Program Entry. Additional data elements, such as DE 300 Veteran Status will record the participant’s veteran status. Refer to Veterans Program Letter (VPL) 05-24 Jobs for Veterans State Grants Staff Roles and Responsibilities and Coordination with Workforce Innovation and Opportunity Act Services to Veterans, published April 25, 2024, for qualifying employment barriers captured under DE 301 Eligible Veteran or Other Eligible Person.	

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43.	Data element 308. (Removal of) Homeless Veteran. If we understand this correctly, with the removal of data element 308 Homeless Veteran, this information could still be ascertained through data element/barrier 800 (Homeless) AND 301 (Eligible Veteran). Please confirm this with Homeless Veteran being a significant barrier to employment.	See response to PIRL Comment #42	
44.	PIRL 309 - Should this also include a “Record 9 if the participant did not disclose” for those who don’t?	Veterans’ Program Letter (VPL) 06-24, Homeless Veterans’ Reintegration Program Requirements and Functions, published September 23, 2024, removes the requirement for HVRP competitive grant recipients to enroll all participants in the public workforce system through the local AJC. However, the Department strongly encourages all grant recipients to refer HVRP participants to services available at a local AJC. As a result, the Department proposes to remove the following PIRL data elements: DE 309 Homeless Veterans’ Reintegration Program Participant DE 310 Homeless Veterans’ Reintegration Program Grantee DE 311 Homeless Veterans’ Reintegration Program Grantee #2 DE 312 Reason the participant is being served by a second HVRP grantee Additionally, the Department withdraws the proposed addition of the new Homeless Veterans’ Reintegration Program Participant ID Data Element.	
45.	In relation to the new Homeless Veterans’ Reintegration Program Participant ID Data Element, CA strongly opposes the addition of this data element. We can collect the 5-digit HVRP Grant Number in DE 310, but collecting the HVRP Participant ID would be burdensome and nearly impossible.	See response to PIRL Comment #44	
46.	PIRL 310 and 311: This change will have minimal impact on the	See response to PIRL Comment #44	

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	JVSG program but will require additional training from LVERs.		
47.	PIRL 313 and 314: Deleting these data elements will not have an impact on the JVSG program.	The Department appreciates this comment in support of the change.	
48.	The employment barrier 2 listing in section 3 does not match the barriers identified for the JVSG program listed by DOLVETS. Expansion and Clarification of Homeless Definition as a Significant Barrier to Employment (SBE) (PDF) https://www.dol.gov/sites/dolgov/files/VETS/legacy/files/VPL-03-14-Change-2.pdf	Veterans Program Letter (VPL) 05-24 Jobs for Veterans State Grants Staff Roles and Responsibilities and Coordination with Workforce Innovation and Opportunity Act Services to Veterans, published April 25, 2024, changed the definition from “significant barriers to employment” to “qualifying employment barriers” and established new eligibility criteria. Data Element 301 will record eligibility based on qualifying employment barriers. As a result, the Department proposes to remove Data Element 315.	
49.	DE 315 - Other Significant Barrier to Employment Will Other Significant Barriers count towards eligibility for DVOP services and what Barriers specifically will this document?	See response to PIRL Comment #48.	
50.	PIRL 316: This will require new programming for the addition of questions of possible military-connected participants to the registration page and training of AJC staff on the changes.	The Department confirms the proposed code value changes for Data Element 316.	
51.	Element 316 - Military-Connected Individual We are supportive of the expanding the definition of an Active Duty military spouse to Military connected individuals and adding qualifiers to include spouse, child, parent or next of kin of a service member of who died while on duty, is a primary caregiver to a veteran or is married to a separated member of the armed forces as this would allow JVSG to serve a wider range of veteran participants.	The Department appreciates this comment in support of the change.	3
52.	DE 316 - Military-Connected Individual Will this replace all references to "Spouse" with Military Connected Individual? Is this Other Covered Person?	The proposed change expands the identification of individuals connected to the military but does not replace all references to "Spouse" as it is the first code value option.	1

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53.	PIRL 401 - Why has the data length changed when nothing has changed in the definition?	The length on this element previously did not account for scenarios where more than one of these code values are applicable.	1
54.	Data element 401. UC Eligible Status. Is this a proposed change where multiple values can be recorded and reported; or we are requesting clarification on the purpose of this update.	See response to PIRL comment #53.	1
55.	Element 401: It is not clear why the character limit has changed from 1 to 5 as this seems like a singular choice answer of 1 through 5 or 0.	See response to PIRL comment #53.	1
56.	402 list three different definitions for Long Term Unemployed. The change will not allow comparisons when looking at prior year data. This will also add a burden to staff on how to answer correctly.	For the WIOA core programs, the only allowable codes for this element will continue to be 1 and 0. These added code values are only usable for specific programs that have statutory differences or flexibility with respect to the definition of Long Term Unemployed. For example, code 2 is specifically allowed for Disaster type National Dislocated Worker Grants (DWG).	1
57.	Data element 402. Long-Term Unemployed at Program Entry. We appreciate the addition of a value of “Record 2” and “Record 3” and clarifying language of unemployment for 27 or more non-consecutive weeks within the past 12 months.	The Department appreciates this comment in support of this change.	1
58.	402 list three completely different definitions for Long Term Unemployed. The first we have been reporting for years. The change will mess with comparisons when looking at prior year data. This will add a burden to staff on how to answer. Understand the need for number 2 for DWG grants. However, number three should not be listed. Or list Option 1 and 3 and no option 2.	See response to PIRL comment #56	1
59.	Element 402: In option “Record 0”, the word condition needs to be changed to conditions.	The Department appreciates this comment and has made this change.	1
60.	Data element 403. Occupational Code of Most recent Employment	The Department appreciates this comment in support of this change.	1

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	Prior to Participation (if available). Due to 100% co-enrollment between Trade and DW, and this element is collected currently for Title I & III, this should not add additional burden with collaboration efforts during co-enrollment and in integrated data management system environments.		
61.	Many data elements are repeated or very similar. Though they may be asking for slightly different data points, and some are optional, it can create confusion. Reduction of similar data and/or clearer definitions that explain why data is similar yet still needed would be helpful. o 407 "Highest School Grade Completed at Program Entry (WIOA)"; 408 "Highest Educational Level Completed at Program Entry (WIOA)";409 "School Status at Program Entry(WIOA)" o Date of Entry/Start date is asked about 5 times. o Date of Exit (in addition to credential completion dates) is asked about 6 times. o Apprentice Status (Active vs. Completed vs. Withdrawn or exit) is asked in 6 fields.	The Department notes that while the names of the elements may sound similar, the definitions of these elements are clearly distinct and have a clear purpose. For example, element 408 captures the highest level of educational completion a participant has obtained, while element 407 captures the highest grade that the participant completed in elementary or secondary school, which is particularly important for individuals that report “no educational level completed” in element 408. Element 409 is crucial to demonstrating whether or not an individual is still actively in school or out of school. With respect to the various entry date, exit date, completion dates, etc. these elements each have a specific and important purpose, and are crucial for tracking a participants progress through a program, and many of these are specifically tied to required performance indicators that look at outcomes that occur within specific timeframes. Regarding the apprentice status elements, the Department makes the distinction between pre-apprentices and registered apprentices in the PIRL apprenticeship schema for data elements PIRL 2901 (Pre-apprenticeship Program Status) and PIRL 2907 (Registered Apprenticeship Program Status) respectively. These collect important apprenticeship information that goes beyond just the exit date of the apprentice.	1
62.	PIRL 602 - Seeking clarification - why is Social Security Disability Insurance included with SSI in Public Assistance reporting elements?	The Department notes that these are all public assistance benefits provided as a part of the Social Security Act, and have been collected together for a number of years.	1
63.	Element 701- Pregnant or Parent Youth	The Department appreciates this comment in support of the change.	1

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	We are supportive of expanding the definition of a parenting youth to no longer require that the youth must be a custodial parent or guardian to have this barrier. This change would increase eligibility opportunities for at-risk youth.		
64.	Data element 901. Date of Program Exit. Either DE901 or edit checks are prohibiting grantees from effectively reporting in a Combined full PIRL that includes the Registered Apprenticeship program elements in the same combined PIRL along with Title I, Title III, Trade, JVSG (8 programs). Registered apprenticeship program needs to actively apply this data element 901 definition of Program Exit to the Registered Apprenticeship Program rather than an altered definition of exit. In the Registered Apprenticeship program, If the intent is to capture when an apprenticeship program ends, commenter team suggests to using different verbiage than “exit”.	The Department note that PIRL 901 should be filled out when the participant exits the grant (i.e. they have gone 90 days without receiving a service). For reporting completion of various components of a program, PIRL 2905 and PIRL 2911 should be completed when a pre-apprentice (PIRL 2905) or apprentice (2911) completes their program. Therefore, the dates for PIRL 2905 or PIRL 2911 should come on or before the date for PIRL 901.	1
65.	Element 905: Please add in the WIOA definition of Youth 14-24.	The Department appreciates this comment and notes that while we did not include the entire eligibility definition for a WIOA Youth, we did add the language “is an eligible youth defined in WIOA Section 3(18) as an in-school youth or out-of-school youth” in response to this comment.	1
66.	In relation to Data Element 914 – Veterans’ Programs, CA suggests leaving value 2 as “Yes, LVER Specialist,” and adding a value 3 of “Yes, Consolidated DVOP/LVER,” to allow for consistency in reporting values across reporting quarters and years. Additionally, CA still has dedicated LVER staff that provide services.	The Department confirms its proposal to remove code value 2 for Data Element 914. LVER and Consolidated DVOP/LVER staff working as a LVER do not provide services directly to participants. The Department withdraws the proposed addition of code value 2 Yes, Consolidated DVOP/LVER. The Department proposes the inclusion of Consolidated DVOP/LVER staff in the definition of DE 914 code value 1, as follows:	1

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		1 = Yes, DVOP specialist or Consolidated DVOP/LVER 0 = No 9 = Unknown	
67.	Field 914 veterans program: This field is used in federal reporting to indicate Veterans program. Where DVOP is yes. The definition for number 2 where staff is consolidated DVOP LVER will mess up federal reporting of program participants, since the old 2 is associated with LVER and they should not touch jobseekers per federal guidance. Only DVOP option is where we consider them a Veteran Program participant	See response to PIRL Comment #66.	1
68.	Date of First DVOP Service: Why an additional field. Date of first DVOP service can be obtained when 914 is a 1 and service for DVOP is indicated in the specified field. First staff assisted first when 1005 is not null.	The Department notes that PIRL Data Element 1005 records the most recent date the participant received a DVOP staff-assisted service, not the first date of service.	1
69.	PIRL 914 - How will this impact the "IVR" that DOL VETS requires for percentage of Intensive Veterans Services provided to non-vets? Will both a 1-DVOP and 2-Consolidated be counted on the report?	See response to PIRL Comment #66.	1
70.	PIRL 914 - I'm not sure if it matters, but the Consolidated DVOP/LVER in our state is called a Consolidated Veteran Service Representative (CVSR). Maybe say Consolidated (CVSR) DVOP/LVER	See response to PIRL Comment #66.	1
71.	PIRL 914: This would require additional MIS programming for tracking as current consolidated staff have separate logins for DVOP duties and LVER duties. If changes are made to existing logins there should be little impact to the JVSG program.	See response to PIRL Comment #66.	1

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72.	PIRL 927 - Is the date reported supposed to be the first eligibility determination ever or the first eligibility determination in the participation episode being reported.	The date for PIRL 927 is associated with the current participation under review.	1
73.	CA suggests to not make any changes to the TAA program reporting requirements until the TAA program is reauthorized. This includes, but is not limited to, Data Elements 927-928, 1321 – 1331, 1503 – 1543.	While the Department understands the commenter’s rationale, due to the long timeline for changes to PIRL, TAA needs to move forward with changes to be prepared for when/if the program is reauthorized.	1
74.	PIRL 928 - Is this element being replace with element 927? The element 927 gives the date of determination but this one is clear that participant is eligible for TAA. No need to keep but hoping that this is combined with 927.	PIRL 928 is being removed because non-TAA participants are not reported in the PIRL.	1
75.	Data element 928. (Removal of) Determined Eligible for TAA. Commenter team agrees with this proposed update as other elements provide the same or similar information collected.	The Department appreciates this comment in support of the change.	1
76.	Data element 931. Apprenticeship Program. Could USDOL further clarify using the value “IRAP”? On Sept 23, 2022 – USDOL rescinded “Industry-Recognized Apprenticeship program (IRAP). (Final rule) US Department of Labor to refocus on proven Registered Apprenticeship model, rescind industry-recognized apprenticeship program U.S. Department of Labor (dol.gov) Rescinded Executive order 13801. (related: Executive order 14016). Does the value “2” IRAP in this ETA-9172 guidance apply in the same manner as the rescinded executive order? If Yes, would it mean “value “2” should be removed?	There are still grants reporting as a part of initiatives that included IRAPs, and therefore this code value needs to remain in place until reporting for those initiatives has completed.	1
77.	In relation to Data Element 1114 – Referred to Jobs for Veterans State Grants (JVSG) Services, are we able to select multiple options? For example, an individual may be referred to JVSG because they have a significant barrier to employment (1) and are between the ages of 18-24 years old (5). Additionally, CA suggests updating the	Veterans Program Letter (VPL) 05-24 Jobs for Veterans State Grants Staff Roles and Responsibilities and Coordination with Workforce Innovation and Opportunity Act Services to Veterans, published April 25, 2024, redefined JVSG eligibility criteria and changed the term from "significant barriers to employment" to "qualifying employment barriers." It also	1

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	Data Element Definitions/Instructions for reported value 2 to include “(i.e. DD-2648 Service Member Pre-Separation / Transition Counseling and Career Readiness Standards or separated due to reduction in force)” and for reported value 3 to clarify that it includes family caregivers “to VA eligible veterans.”	changed the additional populations that DVOP specialists are authorized to serve. As a result, the Department withdraws the proposed changes to Data Element 1114 and proposes the following data element definition revisions: Record 1 if the participant was referred to JVSG services due to a qualifying employment barrier. Record 2 if the participant was referred to JVSG services as a Transitioning Service Member (TSM) who, at the time of enrollment have participated in any part of the Transition Assistance Program, including self-paced online modules and Individualized Initial Counseling. Record 3 if the participant was referred to JVSG services as a member of the Armed Forces who is wounded, ill, or injured located in a military treatment facility/warrior transition unit or as a family caregiver as defined in 38 U.S.C. 1720G(d) of such wounded, ill, or injured members. Record 4 if the participant was referred to JVSG services for reasons other than those listed above. Record 0 if the participant was not referred to JVSG services. Leave blank if this data element does not apply to the participant. The proposed code value changes are: 1 = Referred due to qualifying employment barrier 2 = Referred due to TSM with TAP participation 3 = Referred as wounded, ill, or injured located in a military treatment facility or family	

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		caregiver 4 = Other 0 = Not Referred	
78.	PIRL 1114 - Record 6 is new to me – being referred to JVSG for a non-service connected disability. This doesn’t make sense to me. Does this mean the Veteran is referred because of a disability that was not related to their service? If so, that doesn’t meet an eligibility marker. Is additional reference guidance available to share? Also, of the reasons to refer to JVSG, there should be a referral for an eligible spouse. Why is that not being recorded or is that covered by Record 7?	See response to PIRL comment #77. All referrals in Data Element 1114 should be recorded based on an eligible person’s qualifying employment barrier (DE 1114 code value = 1) or the participant’s authorized additional population (DE 1114 code value = 2 or 3).	1
79.	PIRL 1114: These additional changes will be burdensome on the American Job Center (AJC) as these categories are new areas for tracking and involve adding additional steps and services to track properly for the JVSG triage process. The JVSG program will need to check that these were done appropriately prior to accepting AJC-eligible referrals to the JVSG program. This will also require additional technical assistance from the JVSG program. The additional items may also lead to fewer referrals to the JVSG program as additional processes/services are added to the referral process to the JVSG program. This change will also require Management Information Systems (MIS) programming changes.	See response to PIRL comment #77.	1
80.	Data element 1114. Referred to Jobs for Veterans State Grants (JVSG Services.) Commenter team requests clarification of the Value "6". What is the purpose of this “Referred as non-service connected disability”? When would this option be reported over the other values listed (especially such as Referred due to significant barrier	See response to PIRL comment #78.	1

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	to employment.)		
81.	PIRL 1115 - Record 3 for all other referrals to the VA – why does it include PTSD, TBI, and Substance abuse and are identified as the most common? From an inclusion, equity, and diversity lens, it would be much betterer to say: a. These include referrals to the VA to apply for service connected disability benefits and/or to apply for earned healthcare benefits.	The Department concurs with this recommendation. The Department proposes to change the definition of Data Element 1115, code value 3 to: Record 3 for all other referrals for services from to the Department of Veteran’s Affairs (VA). These include referrals to the VA to apply for service connected disability benefits and/or to apply for earned healthcare benefits.	1
82.	1205 Type of Work Experience This will be new as a required field for Apprenticeship. This will likely be a difficult field to report on accurately with the broad definitions of internships, youth apprenticeship, and broad category of "other work experience". Strong definitions of what should be reported for each will be needed.	The Department agrees that strong definitions to support programmatic accountability is crucial. In this regard, we refer the commenters to Training and Employment Notice (TEN) 23-23, which lays out the quality attributes of pre-apprenticeship programs, inclusive of work experience. We also agree that aligning definitions across activities and programs is likewise crucial. Work experience is experiential learning and should not be classified as training as that term is defined in the PIRL under DE 1303 and DE 1310, for instance. However, it should be noted that there are many models of quality pre-apprenticeship, and they are not rigidly defined in order to be inclusive of different approaches that may focus on different quality aspects. For instance, one quality pre-apprenticeship program may be 3 months, whereas another may be 6 months or longer. One program may focus more on experiential learning, and another may focus more on remediation. We believe this flexibility is appropriate for quality pre-apprenticeship. That said, we also agree that the training component of a pre-apprenticeship program would be reported under the training data elements (e.g., DE 1303).	1
83.	Data element 1205. Type of Work Experience. We agree with the update to include this data element as a required element for the Registered Apprenticeship program to better align across programs. Commenter team suggests either during training of all required	The Department appreciates the commenter’s support of this change. The design of pre-apprenticeship programs varies, and while all pre-apprenticeships have some work experience component, there are some that also include an occupational training component. The training components, when they exist, should be reported in the	1

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	program grantees on the PIRL and reporting, possibly for inclusion: when recording "3-Pre-apprenticeship" in conjunction with the proposed updates to DE1303, for Pre-apprenticeship clarify that the training component is reported under 1303, and the career experiential learning component is reported under DE1205 if that is DOL’s intent with the proposed updates for DE1303. Grantees are seeking clarification from DOL (all programs) to align definitions of “pre-apprenticeship” or to clarify when there are distinctions between registered apprenticeship program and other programs such as WIOA especially in terms of reaching co-enrollment goals. Our state has been utilizing data element 1205 in alignment of WIOA and there has been a need for clarification if the registered apprenticeship program defines “pre-apprenticeship” differently between programs. WIOA for the Youth program considers work experience career/individualized/experiential learning, and not a training activity. Likewise, for DE1303, Pre-apprenticeship under the current WIOA definition/interpretation is not a training activity. See also DE1303.	appropriate training elements. The non-training components of pre-apprenticeship should be reported in element 1205, regardless of if the pre-apprenticeship program in question includes a training component.	
84.	PIRL 1222 - Why does it refer to this as “Federal Contractor Job (DVOP)?” Is “DVOP” included only because it is most likely a DVOP case managed customer will be referred to a federal job? Use of the term DVOP, excludes the CVSR if this is the case. If this is an element that is measured against the JVSG program – it should be changed to JVSG. If it’s not an element related to JVSG at all, then DVOP should be removed.	The Department has reviewed the suggestion and proposes to remove PIRL Data Element 1222 as it is redundant with PIRL Data Element 1111 Most Recent Date Entered into Federal Contractor Job.	1
85.	Data elements 1300 – 1328, and 1406 seem irrelevant for apprenticeship. If they are in a pre-apprenticeship or registered apprenticeship program, they are in a training program.	[OPDR] The Department notes that elements that provide information about training receipt, types, dates, and completion are relevant for a variety of reporting purposes. Several of these elements impact the results of primary indicators of performance like	1

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		Credential Attainment and Measurable Skills Gain, in addition to enhancing the analytical power of the data report to ensure that Registered Apprenticeship Program grant data are included in analyses and reports about the various services provided by ETA programs. For instance, DE 1300 ("Received Training") may seem perfunctory if not duplicative because an individual in a registered apprenticeship program is, of course, receiving training. However, this is a required data element because it triggers inclusion in required performance indicators. The Department declines to make changes in response to this comment. The Department notes that not all pre-apprenticeship programs should be classified as training. In this regard, we refer the commenter to the discussion and responses pertaining to DE 1205 (work experience).	
86.	In relation to Data Element 1301 – Eligible Training Provider ID # - Training Service #1 (WIOA), please allow for ample time for states to implement and collect this Data Element before adding WIPS edit checks and requirements.	The Departments appreciate that some changes will take time to implement and will take this into account in developing the implementation timelines for the changes made through this amendment. While the Departments will provide technical assistance to states to enhance their ability to comply with this, the Departments encourage states to incorporate the collection of this information into their ETP initial and continued eligibility procedures.	1
87.	Converting an existing name field to an IPEDS number or alternatively a new state-defined number will be a significant amount of work for staff. NC requests that states can always use their own existing internal number that can match on the 9171 submission but not require the use of a new IPEDS. This number will be consistent for all time where IPEDS may have to change if done incorrectly.	The Departments will provide technical assistance to states regarding the matching of programs to IPEDS numbers, and notes that for programs that do not have IPEDS numbers, there is no need to look up an ID number as those IDs are assigned using a simple and consistent pattern. While states must report this ID number as described in this field, states may also keep their own identifier in their own systems as well, to be able to track the program's historical information.	1

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88.	PIRL 1301- This is a large undertaking to update provider records and having to assign a provider ID to all ETPL providers and other training providers.	The Department will develop implementation timelines that allow grantees appropriate time to make changes made through this amendment.	1
89.	PIRL 1301 - Tennessee is requesting an explanation as to what would the benefit be to add the provider ID instead of listing the actual name of the provider? Adding these numbers to every provider and ensuring that they are correct will be a huge burden to the ETPL team. Also any time you wanted to know what provider you were looking at when viewing the ETPL 9171 PIRL you would now have to go to a website to plug in the provider number when it already had the ETPL provider name in the current version.	The Department’s experience with using the ETP provider name to determine which programs are provided by the same provider have shown that even within a single state the names of providers are often inconsistently reported, or there are several providers with very similar names, a problem that only gets worse when comparing data across different states’ and years’ reports. Adding in an ID number, particularly when an IPEDS number is available, will enable such efforts to be conducted with much greater accuracy and efficiency, and has the potential to lead to the identification of even greater efficiencies, like identifying providers that are working with and reporting to multiple states.	1
90.	Data element 1301. Eligible Training Provider ID # - Training Service #1 (WIOA). If adding Youth as a program to this element, would DOL want to include a disclaimer regarding the Youth program responding for reporting element as "Training Provider" rather than an "Eligible Training Provider"? Commenter suggests DOL consider removing a portion of this PIRL element name of "Eligible" to align with other related elements removing “eligible”. (Remove “eligible”) or if we are misunderstanding the purpose of adding this as a required element for the WIOA Youth program, then clarify that “eligible” should remain in the data element name but this element would only be utilized for some youth and when co-enrolled with another program such as Title I Adult or Dislocated Worker.	The addition of Youth to this element was done specifically because certain participants in the WIOA Youth program are eligible to use ITA funds to obtain occupational training from an Eligible Training Provider, and therefore should be reported in the same way such participants would be reported in the WIOA Adult or WIOA DW programs would be.	1
91.	PIRL 1301 - Current setting for this element in ETO is the provider	See response to PIRL comment #87.	1

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	name. How will the number be provided to staff? Looking it up on the ed.gov website every time is not adequate. Will there be a backend system conversion for this element? Or a search function similar to the current O*NET code search?		
92.	Going to a website for each provider ID is time consuming. Especially since the website cannot be merged and uploaded within our state case management systems. Each provider has to be looked up one by one. The site does not provide a download of all to be extracted and to be merged. The time and burden to add this is large for many states.	See response to PIRL comment #87.	1
93.	PIRL 1301 – Eligible training Provider ID: The desire to easily connect the institution-level data reported on the ETA-9171 report to the individual-level data on the ETA-9173 report, as well as connecting data for a given provider across multiple states, through a provider ID is recognized with the suggested modifications to this element. However, implementing such a requirement after decades is burdensome and could fail to be applicable to its intended purpose. State workforce agencies operate established data systems where providers created profiles long ago to submit programs for inclusion on the eligible training program list. To ensure compliance and gather this new data retroactively, state workforce agencies will need to ask institutions to verify whether they are required to report to IPEDS and to provide their assigned ID when submitting a program for consideration once this requirement is implemented. The knowledge of whether a provider possesses an IPEDS ID is exclusive to the institution itself, not to the	The Departments appreciate that some changes will take time to implement and will take this into account in developing the implementation timelines for the changes made through this amendment. While the Departments will provide technical assistance to states to enhance their ability to comply with this, the Departments encourage states to incorporate the collection of this information into their ETP initial and continued eligibility procedures. The Department will develop implementation timelines that allow grantees appropriate time to make changes made through this amendment. The Departments will provide technical assistance to states regarding the matching of programs to IPEDS numbers, and notes that for programs that do not have IPEDS numbers, there is no need to look up an ID number as those IDs are assigned using a simple and consistent pattern. In scenarios where a program truly has multiple different IPEDS numbers for the same program, states should report the IPEDS number associated with the campus address they are reporting for that program. However, states should consider whether the existence of	1

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	staff of state workforce agencies. Often, the individual submitting the application may be unaware of the IPEDS ID, which could lead to either incorrect data entry to satisfy the requirement or a refusal to submit the application due to lack of information. In cases of incorrect data entry, state workforce agencies do not keep a list of approved IPEDS IDs, making it impossible to verify and ensure the accuracy of this information. Incorrect entries could also occur if a provider claims not to have an IPEDS ID, resulting in the assignment of a state-generated code. Any of these scenarios could hinder a state workforce agency's ability to fulfill reporting requirements, as it is expected that an edit check will be implemented to ensure that IPEDS IDs correspond with an existing federal list, like the new requirements for the ONET-SOC Code aligning with the 2019 ONET-SOC taxonomy Furthermore, the proposed modification brings up issues regarding the misrepresentation or misaggregation of the outcomes of the state's providers/programs on TrainingProviderResults.gov. Pennsylvania boasts numerous institutions, some of which are likely IPEDS reporters, with multiple campuses. Combining performance data by IPEDS ID, especially if an institution is only given one ID regardless of its campus locations, could potentially distort consumer decision-making by either exaggerating or downplaying a program's performance due to the aggregation. These concerns are also relevant to the ETA_9171 suggested new data element 'Unique Provider/Institution ID'.	multiple IPEDS numbers is an indication that the program on their state ETP list is more than one program of training services.	
94.	PIRL 1301 - As this field relates to Registered Apprenticeship	The PIRL already has a field for RAPIDS numbers to be reported, and this field is not a	1

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	Program reporting, we recommend that the data definition be expanded to include the requirement to record the Registered Apprenticeship Sponsor’s RAPIDS ID and the length of the data field be increased to accommodate the length of this ID number. This will allow grantees to record a known identifier, as well as potentially allow for analysis at the federal level on the level of involvement of national Registered Apprenticeship programs with the national workforce system.	required data element for the OA-managed grants, the Department therefore declines to incorporate this suggestion here.	
95.	In relation to Data Element 1303 (1310 and 1315) – Type of Training Service #1 (#2 and #3) (WIOA), CA does not agree with the update to add Pre-Apprenticeship Training as Code Value #13. There is already confusion relating to whether pre-apprenticeship programs are considered a Training Service or not, and this would further that confusion. Since pre-apprenticeship programs are not considered a Training Service, it should not be collected in 1303 (1310 and 1315). If the participant is in an occupational training component of a pre-apprenticeship program that is separate from the work experience component, states should just report this as Code Value 6, Occupational Skills Training (non-WIOA Youth).	The design of pre-apprenticeship programs varies, and while all pre-apprenticeships have some work experience component, there are some that also include an occupational training component. This change is intended to capture this nuance more accurately. Work experience components of pre-apprenticeship should be reported in element 1205, regardless of if the pre-apprenticeship program in question includes a training component. When there is a training component to the pre-apprenticeship, it should be captured in one of these training types elements, most likely in PIRL 1303 since pre-apprenticeship training is likely to take place before other training types, like registered apprenticeship.	1
96.	Field 1310- Code 13 should only be used is the participant is in an occupational training component of a pre-apprenticeship program that is separate from the work experience component. How does one differentiate when to use a 6 or a 13?	If the occupational training the participant receives is a part of their pre-apprenticeship program, users will report code 13. If the participant receives occupational training that is not formally a component of their pre-apprenticeship program, then users will report code 6.	1
97.	PIRL 1303/1310/1315 - 1) For Type of Training Service WA uses the service TAA Approved	1) TAA Approved Training means training approved under the 6 criteria of the TAA	1

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	Training. This is not on the list. I am curious as to whether this causes PIRL errors if we are using the TAA Approved Training service or is it linked to code 06? 2) Might DOL also consider adding a youth apprenticeship code? Here in Washington, pre-apprenticeship and youth apprenticeship are both recognized as pathways to registered apprenticeship, though they have separate and distinct requirements for registration with our state’s registered apprenticeship council.	Program. TAA Approved Training can be funded by TAA or other workforce programs. No, there would be no PIRL errors based on this element. TAA approved training services could be any allowable type of training. 2) To avoid confusion, the Departments decline to add a separate youth apprenticeship code. At this time, the Department considers youth apprenticeship as registered apprenticeship for youth and not a pathway to registered apprenticeship. The Department also does not register pre-apprenticeship programs at the federal level and do not have specific/separate requirements for registered apprenticeship programs that serve youth.	
98.	Data element 1303, 1310, 1315. Type of Training Service #1 (WIOA). The addition of a value of “13-Pre-Apprenticeship Training” as the training component of a pre-apprenticeship makes sense with the caveat that pre-apprenticeship, the career planning component of Pre-Apprenticeship, still has a place to be reported such as DE1205 for Combined PIRL. States/grantees are seeking alignment in the definition of pre-apprenticeship and clarification. See also DE1205 comment.	See response to PIRL comment #95. The Departments appreciate the comment in support of this change and confirms the commenter’s understanding that the non-training components of pre-apprenticeship should be reported in element 1205, regardless of if the pre-apprenticeship program in question includes a training component.	1
99.	PIRL Element 1303 – Type of Training Service and PIRL Element 1205 – Type of Work Experience: The lack of federal structure regarding pre-apprenticeship program design has resulted in states developing individualized processes and program guidelines. Based on federal guidance, Pennsylvania assumed that it was ETA’s recommendation to always consider each element of pre-apprenticeship and the full term of the pre-apprenticeship program to be a work experience (minimally for youth). The reality of the Pennsylvania pre-apprenticeship structure would more closely align	[OPDR] See response to PIRL Comment #96. This change does not mean that training is a required component of a pre-apprenticeship program, merely that it is a possibility in certain pre-apprenticeship program’s design. The Department also notes that this change does not reflect a change with regard to any ITA policies, particularly with regard to the WIOA Youth program. Pre-apprenticeship programs with occupational training components could support the training component with an ITA for the WIOA Youth program before this change and that will continue to be the case after this change. With respect to identifying credentials and measurable skill gains, grantees should approach pre-apprenticeship	1

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	pre-apprenticeship to what we would consider to be training, as there are no required paid work experience components to the program structures. To clarify, can this suggested modification be interpreted as requiring that a pre-apprenticeship program design include both a work experience and training component OR can grantees use discretion in determining whether their pre-apprenticeship programs are aligned with one or the other, without a need to force both components. Does this change also indicate that WIOA Youth ITA funds (and other grant funds) can also now be used to support a pre-apprenticeship training component? Also, if pre-apprenticeship programs or components of programs are to be considered training, what are appropriate ways to identify and differentiate between recognized credentials and measurable skill gains associated with these programs?	occupational training components the same as they would any other occupational training. The Department notes that it can be beneficial to identify the potential credentials and skill gain types that are likely to result from a training program in advance of an individual’s participation, and in the case of an ITA funded training with an ETP, knowing the expected credential is a requirement. As necessary, the Department will issue sub-regulatory guidance and technical assistance to provide additional clarifications and examples.	
100	Data element 1304 and 1305. Program of Study by Potential Outcome and Program of Study CIP Code. Commenter team appreciates and agrees with this proposed update to include the Trade program in reporting Program of Study as this will provide for more consistent reporting of Program Of Study an in conjunction with the proposed remove of 1331. Commenter team, with the proposed update from "Eligible Training Provider..." to just Program of Study/POS-CIP (removing “eligible training provider”, would pose for DOL consideration to include DE1304, 1305 for the Youth program for Youth program participants enrolled in post-secondary training programs.	The Department appreciates this comment and accepts the suggestion that PIRL 1304 and 1305 be added to the list of WIOA Youth elements.	1

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101	Element 1304: TAA is already reporting in other elements these outcomes so do not believe there is a need to report this one also. If it is deemed a necessity for TAA to report, TAA believes it would best convey its meaning to have the first sentence say, “Enter the participant’s potential outcome(s) for Program of Study” and the Element Name to be “Potential Outcome for Program of Study”	The Department is always exploring ways to align data across programs whenever possible. This addition for the TAA Program is one of those changes. The Department appreciates and accepts the suggestion to make clarifying changes to the element name and language.	1
102	PIRL 1305 - How will CIP Code be provided to staff? Looking it up on the ed.gov website every time is not adequate. Will there be a backend system conversion for this element? Or a search function similar to the current O*NET code search?	The CIP code for this element should be populated based on the CIP code of the training program they are being enrolled in. State ETP lists should have this information available in most cases.	1
103	Element 1305: TAA believes that this will burden the program throughout the United States, and that this requirement will not provide the information DOL is seeking. The adoption of CIP codes at a program level has not been uniform across all educational facilities as a result DOL will end up with CIP codes that have been selected by TAA staff members and higher education institutions resulting in inconsistent data due to self-interpretation.	The CIP code has been a required element for non-Youth WIOA since the inception of PIRL. We recognize this is new for the TAA Program but believe there is sufficient expertise in the states to be able to report on this element.	1
104	Element 1321: TAA is fine with this change. The first 3 choices should be grayed as unapplicable under all laws.	The Department appreciates this comment in support of the change. However, options cannot be grayed out on the PIRL.	1
105	Data element 1322. Date of Most Recent TAA Employment and Case Management Service. Commenter team appreciates the reporting clarifying description that this element is the Date of Most Recent TAA Employment and Case Management Service.	The Department appreciates this comment in support of the change.	1
106	Data element 1329. Part-time Training. Commenter team suggests a cosmetic update in correctly the misspelling in the word “receive”	The Department agrees with this change. The spelling change will be made.	1

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	in “leave blank if...”		
107.	Data element 1331. (Removal of) Training Leading to an Associate Degree. Commenter team agrees with removal of 1331 for Trade with proposed updates to 1304 that can be used for Trade program reporting and analysis.	The Department appreciates this comment in support of the change.	1
108.	Data element 908 & 1501. Rapid Response (Y/N) & Most Recent Date attended rapid response. Commenter team feels that data element 908 and 1501 can be used to analyze receipt of (multiple) Rapid Response services (RR event attendance). With consideration to possible reauthorization, consider adding new element of Date of 1st Rapid Response services received.	The Department would not support the addition of this element at this time.	1
109.	Data element 1503. Most recent date received follow-up. Commenter team agrees with this update to include Trade program provision of follow-up services in conjunction with partnership and collaboration through 100% co-enrollment with DW. To minimize duplication of the provision of follow-up, however, this could be recorded either as part of the Trade enrollment and service delivery OR as part of the partner program such as WIOA dislocated worker enrollment and follow-up.	The TAA Program does provide follow-up services. Therefore, reporting in this element would be based on follow-up services provided by a partner program such as WIOA.	1
110.	Element 1503: TAA does not provide follow up services. It should say for the Element Name “Most Recent Date Received WIOA Title 1 Follow-up services”. Record the most recent date on which the participant received WIOA Title 1 follow-up services, which may include counseling in the workplace.	Although TAA cannot provide follow-up services, several workforce development services can. Therefore, the Department does not support the change to this element title.	1
111.	Data element 1505. (Removal of) Job Search Allowance count (TAA). Commenter team agrees with this update for the removal of this data element requirement for Trade as this may not have been the	The Department appreciates this comment in support of the change.	1

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	most beneficial data to report and can gain a basic understanding of the same through other related elements.		
112	PIRL 1506 -Not sure why Job Search Allowance Data element name is current quarter costs yet the definition current and proposed states accrual.	The element is being changed to read: Job Search Allowance Current Quarter Expenditures. All expenditures are reported to the Department as accrued, so these are in line with each other expenditure elements.	1
113	Data element 1506. Job Search Allowance Current Quarter Expenditures. Suggestion to consider DE name as "Job Search Allowance Expenditures Current Quarter	The Department appreciates the comment. However, we will keep this language in line with other expenditure elements.	1
114	PIRL 1507 - Job Search Allowance - Total Costs is the data element name yet it is counting the accruals. Is there a element for costs paid?	The element is being changes to read: Job Search Allowance -Total Expenditures. All expenditures are reported to the Department as accrued. There is not an element for costs paid.	1
115	PIRL 1509 - Current quarter costs yet definitions still state accrual. Shouldn't this data element name be the same as instructions - Accrual.	The element is being changed to read as: Relocation Allowance Current Quarter Expenditures. Therefore, there is no need to add the word accrual to the element name.	1
116	Data element 1509. Relocation Allowance Current Quarter Expenditures. Suggestion to consider DE name as "Relocation Allowance Expenditures Current Quarter	The Department appreciates the comment. However, we will keep this language in line with the other elements in the series.	1
117	PIRL 1510 - Accruals but name of element is cost total.	The element is being changed to read: Relocation Allowance -Total Expenditures.	1
118	Data Elements 1511-1540: With the original data element names and definitions, Date Received or Weeks Paid was easily determined based on payment dates in our case management system. In introducing the change to Date Approved, there is room for confusion because not all states use the same Unemployment Benefits vendor. The data ‘behind-the-scenes’ could be laid out differently based on the case management system design and how the documentation of monetary details are structured/showcased.	All expenditures are reported to the Department as accrued. Therefore, reporting dates “paid” is incorrect reporting to the Department. Accruals for TRA and ATAA/RTAA are on the date the payment is approved.	1

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	Clarifying language should be added to the definitions in order to bridge the gap between users of GSI and all other systems; that way approval data can be obtained without the worry of capturing incorrect information.		
119	Data element 1511. Basic TRA Date Approved First Payment. (proposed) Commenter team appreciates the update to this and related data elements clarifying these reporting elements as Date (payment) approved versus "Date Paid" or "Date Received" as this may help grantees align data integrity between program and financial reporting.	The Department appreciates this comment in support of the change	1
120	PIRL 1514 - Name of element is Total Weeks Paid but current and proposed data element definitions are stating accrued.	The element name is being changed to read: Basic TRA - Current Quarter Expenditures	1
121	PIRL 1519 - Amount Paid this quarter is the data element name. Current and Proposed Data elements definitions state accrual.	The element name is being changed to read: Additional TRA – Current Quarter Expenditures	1
122	PIRL 1520 - Total Amount Paid this quarter is the data element name. Current and Proposed Data elements definitions state accrual.	The element name is being changed to read: Additional TRA – Total Expenditures-	1
123	PIRL 1524 - Paid this quarter vs accrued in the definition.	The element name is being changed to read: Remedial/Prerequisite/Extended TRA – Current Quarter Expenditures-	1
124	Element 1536: Does “current” quarter mean report. 1535 says “Current Report Quarter” and we would recommend that 1536 says the same.	The Department will make the additional change to Element 1535 to read “current quarter” instead of “current report quarter.” This will be in line with the other elements in the series. “Current quarter” is the current report quarter.	1
125	Additionally, we request clarification on the difference between ‘Max individual Benefit’ and ‘Max Statutory Benefit’ as used in PIRL element 1540 be included in the PIRL definition to ensure accurate implementation.	The Department will add clarification in the definitions for codes 1 and 2 as follows: Record 1 if the participant reached their individual maximum benefit based on their earnings prior to the TAA qualifying separation (one half the difference between separation	1

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		and reemployment wages). Record 2 if the participant reached the statutory cap on the amount for this benefit (e.g. \$10,000 or \$12,000 depending on TAA Program version).	
126.	PIRL 1540 - Why change from int 1 to int 3?	This has been changed to int 4 based on the new code addition to the element. A participant could have reached more than one maximum (individual maximum, statutory maximum, max duration, and max earnings), so the state should report any/all that apply.	1
127.	Element 1540 - A/RTAA Maximum Reached The detailed breakdown of why the maximum benefit was reached would require case management system updates and this detail does not support better case management or customer service.	The change gives the Department more detail to conduct deeper program analysis.	1
128.	Element 1540: TAA suggests that the verbiage says “Record 1 if the participant's projected earnings in the current RTAA year exceeded the maximum allowed.” “1 = Projected earnings exceeded the maximum allowed”	The Department appreciates your comment and has added an additional code value to this element: Record 4 if the participant’s cumulative wages exceeded or projected to exceed the statutory limit within the year. 4= Max Earnings	1
129.	PIRL 1540 - changing a previously reported Yes/No to a more detailed definition has the potential of major maintenance issues.	The change gives the Department more detail to conduct deeper program analysis.	1
130.	Element 1541: TAA suggests that the verbiage says: “Record 1 if there were any A/RTAA overpayments during TAA participation.”	The Department agrees with this change. It will read: Record 1 if there were any A/RTAA overpayments during TAA participation.	1
131.	Data elements 1600-1706 are extremely difficult to collect. Although we can use UI Wage data if we provide a SSN, it is not possible to have a successful WIPS upload with an answer for these elements.	The WIPS edit checks for these elements enforce logical relationships between these elements. For example, when a participant’s earnings are unknown, then their employment status must also be reported as unknown. The Department will provide technical assistance to users who need assistance in reporting according to these logical edit checks.	1

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132	1= In-State and 6= Out-State - NC currently has out of state wage data that is part of our states' UI as well as out of state SWIS data. We recommend that this be left as 1=State UI and 6 = SWIS/FEDES out of state.	The Department appreciates this comment and has made corresponding changes to the code values and definitions of these elements to account for this. The updated approach will clarify that code 1 will indicate that the data came from a match against the state's own UI wage match system, while code 6 will reflect wage matches conducted outside of that state's system, such as SWIS matches. The definition also clarifies that in cases where wage record results from the state's own system and an external system are combined, code 6 should be reported.	1
133	Type of Employment Match change This change would require many wage processes to be updated and would be burdensome on the state. How will the Feds use the additional value of knowing if 1 came from in state wages or 6 out of state wages in the PIRL?	The State Wage Interchange System (SWIS) Data Sharing Agreement limits the Department of Labor's (DOL) Employment and Training Administration (ETA), the Department of Education's (ED), Office of Career, Technical, and Adult Education (OCTAE), and Office of Special Education and Rehabilitative Services, Rehabilitation Services Administration (OSERS/RSA) use of Wage Data obtained by states through SWIS. Wage Data reported by states to ETA, OCTAE, or OSERS/RSA may be used for purposes outlined in Section IX.F of the SWIS Agreement. Understanding the source of the Wage Data clearly identifies how the reported Wage Data can be used.	1
134	Data element 1601, 1603, 1605, 1607. Type of Employment Match < > Quarter after Exit (1st, 2nd, 3rd 4th) Commenter team appreciates the reporting distinctions of differentiating between in-state wage data and out of state wage data. Many records include a combination of in-state and out-of-state wage data within a given reporting quarter. Commenter team encourages consideration of adding another reporting option to identify if wages for a given quarter were "both in-state and out-of-state".	See response to PIRL comment #132	1
135	PIRL 1601/1603/1605/1607 - DOL proposes to distinguish between	As defined in Section V.EE. of the SWIS Agreement, Wage Data are individually identifiable	1

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	outcomes identified through in-state UI wage data versus out-of-state UI wage data, DOL should bear in mind the constraints imposed on States as it relates to confidentiality and retention of out-of-state UI wage data under the State Wage Interchange System (SWIS) agreement, namely using only aggregate data for Federal performance reporting, which seems to be at odds with individual, SSN-level disclosure in the PIRL.	information reported quarterly by employers. Wage Data include, but are not limited to, employer and employee names, Social Security Numbers (SSNs), Federal Employer Identification Numbers (FEINs), state tax identification numbers, associated wages, and North American Industry Classification System (NAICS) codes. Wage Data are considered confidential Unemployment Compensation (UC) information under 20 CFR part 603. As defined in Section V.B. of the SWIS Agreement, “Aggregate Data” are “Wage Data” that have been stripped of any information that would identify the individual(s) or the employer(s) to whom the data pertain, including but not limited to, name and SSNs or FEINs, and any state tax ID number that have been aggregated into a group(s) containing no fewer than three (3) records, provided that nothing in the SWIS Agreement shall prevent a PACIA from observing a more stringent aggregation policy with regard to its own use and reporting of data. If reported employment outcomes are derived from Wage Data from SWIS it is subject to the restrictions of the SWIS Agreement.	
136	The change on 1601 to indicate if Out of State UI and In state UI, why separate. Both are UI wages. If SWIS can be used by all these programs why separate In state vs out of state. The changes to get this information listed is cumbersome and will take many man-hours to complete.	SWIS can be used for the programs outlined in Section IX of the SWIS Agreement. Wage Data reported by states to ETA, OCTAE, or OSERS/RSA may be used for purposes outlined in Section IX.F of the SWIS Agreement. Understanding the source of the Wage Data clearly identifies how the reported Wage Data can be used.	1
137	PIRL 1601/1603/1605/1607 - What is the purpose of splitting State UI versus Out of State Wages (SWIS) separately?	See response to PIRL comment #133.	1
138	Data element 1608. Training Related Employment. Commenter team recommends to consider adding option if participant did not complete training in addition to the proposed update(s).	The calculation of the Training Related Employment is intended to capture how effective the training services provided by WIOA programs are at assisting participants in obtaining employment related to the training they received. Whether the participant completes that training may impact whether they obtain employment related to that training, and	1

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		therefore such participants are relevant to include in such a calculation. Therefore, the Departments decline to make changes in response to this comment.	
139	Element 1608: TAA suggests that the verbiage says: “0 = Training not related to employment or did not obtain employment.”	The Department appreciates this suggestion and has made the suggested change.	1
140	Element 1609 - First Recall by Layoff Employer The detailed breakdown of recall by layoff employer would require case management system updates and this detail does not support beter case management or customer service.	States have repeatedly reported to the Department anecdotally that workers often leave the program to return to employment at the firm from which they were separated. The revision to this element will help the Department evaluate this.	1
141	Data element 1609. First Recall by Layoff employer. Commenter team appreciates the proposed update. For DOL consideration, there would be some value in recognizing (using this data element) where participants recalled to employer such as to include in the Dislocated Worker or Dislocated Worker Grants in relating to Credential outcomes. With the 100% co-enrollment between Trade and Dislocated worker, this would make sense to be able to identify dislocated workers in the same manner. Frequently, the data integrity measure “Training Completion” as one example may be adversely affected when a participant is recalled where they may opt to return to work rather than complete their training program(s) WIOA/Trade may have been assisting with. While we fully understand programmatically the goal would be to see a participant through to training completion, the reality is that sometimes customers opt to return to work and are not able to continue training will working full time.	Participants failing to complete approved training after returning to work has been a concern of the Department for years. To address this, the TAA Final Rule at 20 CFR 618.645(e) allows workers to remain in approved training even after they are employed.	1
142	Element 1609: TAA suggests that the verbiage says: “Record 1 if, at any point during participation, the participant was recalled, for the first time, by the Trade Affected employer.” & “Record 2 if, at any point between the point of program exit and the end of the 4th	The Department appreciates the suggested changes but is retaining the element as proposed.	1

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	quarter after program exit, the participant was recalled, for the first time, by the Trade Affected employer.” & “Record 0 if the participant was not recalled by their Trade Affected employer.” & “0 = Not recalled by their Trade Affected employer”		
143.	In response to the ICR’s request to seek comments to enhance the quality, utility, and clarity of the information to be collected, COABE calls your attention to the following language in OCTAE’s Program Memorandum 17-2, which reads: “For all participants, performance may be measured by: - Achievement of at least one educational functioning level, or - Documented attainment of a secondary school diploma or its recognized equivalent. For participants enrolled in a workplace literacy or integrated education and training program, performance may be measured by achievement of any of the 5 measurable skill gains.” Accordingly, COABE urges that consistent language be used to define measurable skill gain (MSG) Type 4. Otherwise, the definition is too limiting for participants in other programs as allowed by OCTAE. To accomplish this, COABE recommends this change to the definition in line 76 of the Performance Report Specs, as follows: "Number of participants enrolled in on the job training, an apprenticeship, workplace adult education programs, or integrated education and training during program participation who had a successful outcome".	The Department agrees with the commenter’s suggestion and have made changes to this item.	1
144.	TEGL 10-16 Change 3, for EFL list the following: 1. Documented achievement of at least one educational functioning level of a participant who is receiving instruction below the postsecondary level – Programs may measure educational functioning level gain in one of four ways:	The Department agrees with the commenter’s suggestion and has made changes to this item.	1

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	(a) States may compare the participant’s initial educational functioning level, as measured by a pre-test, with the participant’s educational functioning level, as measured by a post-test; (b) States that offer adult high school programs that lead to a secondary school diploma or its recognized equivalent may measure and report educational gain through the awarding of credits or Carnegie units; (c) States may report an educational functioning level gain for participants who are enrolled in a program below the postsecondary level and who enroll in State recognized postsecondary education or training during the program year. A program below the postsecondary level applies to participants enrolled in a basic education program; or (d) States may report an educational functioning level gain for participants who pass a subtest on a State-recognized high school equivalency examination. Notes: C is reworded in the TEGl but not reworded in the 9172. D is missing from the 9172 field listing, but in the TEGl		
145.	Data elements 1806 through 1810 are difficult to collect and seem unnecessary for registered apprenticeship programs when the apprentice progress is already tracked in the DOL RAPIDS system	The Department notes that these data elements are necessary for the purposes of calculating the Measurable Skills Gain (MSG) performance indicator and are crucial to the assessment of grantee performance. The Department has provided and will continue to provide technical assistance related to the collection and reporting of MSG. The Department encourages grantees to leverage other data systems/collections that they have access to that have this information, in order to reduce burden and reduce instances where the same information is collected multiple times. The Department recognizes that PIRL 1809 (Date of Most Recent Measurable Skill Gains: Training Milestone) and PIRL 1810 (Date of Most Recent Measurable Skill Gains: Skills Progression) are likely to be the most applicable for registered apprenticeship. However, the other skill gain types, including those	1

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		pertaining to EFLs, may well pertain to a quality pre-apprenticeship program. Furthermore, "progress" as that is tracked in RAPIDS - does not comport with the MSG required performance indicator, and not all states utilize RAPIDS.	
146.	PIRL 2003 - How does the inclusion of an additional field for DWG grant numbers impact how PIRL elements 105,106 and 107 are to be populated?	Yes. The Department will provide additional technical assistance to grantees as this change is implemented, but this change will result in an updated approach to reporting DWG grant numbers beyond the first grant. Under the updated approach, DWG grantees will report up to 2 grant numbers per participant and will no longer use PIRL elements 105, 106, 107	1
147.	PIRL 2106, 2109, 2110, 2111, 2112, 2113, 2114, 2115, 2116, 2117, 2119, 2121, 2123 -Request that DOL issue Change 2 to TEGL 23-19 (Data Element Validation) to remove those data elements as they are currently reflected in DEV guidance as having source documentation requirements.	As is the Department’s standard practice, the Department will review its published guidance and make changes where appropriate to align guidance to changes in the ICR.	1
148.	We continue to recommend that DOL not require grantees to collect Social Security Numbers (SSNs) for the PIRL. Rather, DOL should find alternative means to obtain SSNs from other databases and then match that information to the extensive individual data collected via the PIRL. Many grantees have experienced difficulty in securing Social Security Numbers (SSNs) from apprentices and sponsors. Furthermore, the information is highly sensitive, requiring safeguards and resources that can be a burden on grantees	The Department appreciates the sensitive nature of SSNs and the challenge that can be posed to grantees in collecting them. However, most of the programs covered by this collection are required to conduct matching against UI wage records and therefore an SSN is necessary for that purpose. For the Department to obtain SSNs through some other means and still be able to connect them to the records of the participants in these programs would require an expansion of this collection to obtain numerous other sensitive elements of Personally Identifiable Information (PII) and then establish new data sharing arrangements that would likely not be able to produce the same level of precision and value in the outcomes information obtained. This means that to make this change would increase the amount of PII collected while reducing the analytical value of the outcomes obtained, therefore the Department declines to make this change. The Department remains committed to ensuring the protection of the PII that is collected and reported under all of its collections, including this one, and maintains industry best practices in its protection of	1

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		PII from exposure.	
149.	The most relevant data for Registered Apprenticeship and Pre-apprenticeship are data elements 2700 through 2920.	The Department appreciates this comment in support of the elements collected for Registered Apprenticeship grants.	1
150.	2900 RAPIDS Number This number does not exist for those apprenticeships registered under state apprenticeship agencies that do not utilize RAPIDS.	The Department notes that PIRL 2900 (RAPIDS Number) is not required for those entities that do not utilize RAPIDS, and further notes that under the definitions/instructions for the data element that grantees may “Leave blank if this data element does not apply.”	1
151.	PIRL 2900 - WA state is concerned that this element is too burdensome to collect for RI only records on the PIRL.	See response to PIRL comment #150.	1
152.	Data element 2907. Registered Apprenticeship Program Status. Commenter team appreciates the clarifying language of updating all related data elements by indicating "Registered" in references to Registered apprenticeship...	The Department appreciates this comment in support of the change.	1
153.	Data element 2912. Type of RTI Provider. For consistency in reporting. RTI makes sense and can differentiate what many grantees may refer to as RI (Reportable Individual). What is the purpose to adjust to “RI” versus “RTI”? Suggestion to keep as RTI.	The Department notes that Related Instruction is the term utilized in federal regulations that currently govern registered apprenticeship. The Department refers commenters to 29 CFR part 29.2 ("definitions"). To maintain consistency, we will continue to align with 29 CFR part 29.2.	1
154.	PIRL 2914 - Registered Apprenticeship Grants Program Status: We need clarity on who would fit under the Incumbent Registered Apprentice code value. From our reading, it sounds like this is referring to an individual that was previously enrolled in an apprenticeship and then withdrew and has since enrolled in a new apprenticeship? Would this include both individuals that received a grant funded service and individuals who are enrolled in a grant-funded registered apprenticeship program?	The term "incumbent apprentice" is designed to capture a specific situation wherein an apprentice in a grant program can transition to a new grant program once the initial grant ends if the grantee has an additional grant that can enroll the registered apprentice who has not yet completed their registered apprenticeship program. Therefore, an incumbent apprentice is receiving grant-related services from the same grantee from which they previously received grant-funded services. The registered apprentice has been "re-enrolled" in a subsequent grant with the same grantee to allow the registered apprentice to complete their	1

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		program that started under a previous grant program.	
155	Element 2914 – Registered Apprenticeship Grants Program Status For the new data element code value definition for incumbent workers, it is unclear what the purpose of this element is. We would like to better understand what is meant by previously enrolled in a grant-funded or traditional registered apprenticeship and is no longer supported by the sponsor. An example of this situation would be helpful. It is unclear the need to capture the code information. Any potential situations of this occurrence would be very limited and appear unnecessary. Accurately capturing this information may be problematic.	See response to PIRL comment #154. Another example of an incumbent registered apprentice would be an individual who became a registered apprentice in the second year of a three-year grant. If the registered apprentice is participating in a four-year registered apprenticeship program, they would only be able to receive grant-funded support/assistance for their first year. If the grantee received a subsequent grant, the apprentice could be enrolled in the second grant to complete the rest of their registered apprenticeship program. Thus, the "incumbent apprentice" involves the same grantee with two different apprenticeship grants.	1
156	New Element – Date Started registered Apprenticeship Program (Incumbent Registered Apprentice) and PIRL Element 2914 – Registered Apprenticeship Grants Program Status: The definition for “PIRL Element 2914 – Registered Apprenticeship Grants Program Status; Option3 – Incumbent Registered Apprentice “does not make sense in relation to the structure of registered apprenticeship. We believe these changes are unnecessary and would be capturing repetitive information. The date a participant “starts” or “enrolls” in a registered apprenticeship program will not differ based on if they are an incumbent worker or a new hire. If an incumbent worker is awarded previous credit at enrollment for time already worked on that job, that still does not change the enrollment/start date as it is captured as previous credit awarded and may only affect the end date. Our interpretation of an incumbent worker registered apprentice would be that the currently enrolled apprentice was	See responses to PIRL comments #154 and #155. An incumbent worker and an incumbent registered apprentice are distinctly from one another. The primary distinction here is that an incumbent worker was not previously enrolled in a registered apprenticeship program and is a term used by several programs to refer to a participant that was employed at the start of participation. However, an incumbent registered apprentice is someone who, at the start of participation in the apprenticeship grant, was already enrolled in a registered apprenticeship program supported by grant funds and is being transitioned from one grant to another. In this scenario the prior grant’s period of performance ends before the individual’s registered apprenticeship program is complete, but the grantee has been awarded a new grant. The grant recipient may enroll the registered apprentice into their new grant so that they may complete their RAP. When this happens, the registered apprentice is considered an incumbent registered apprentice in the new grant.	1

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	employed with that sponsor/employer prior to enrollment.		
157.	Data element 2914. Registered Apprenticeship Grants Program Status. Commenter team appreciates the addition of Recording a value of "3" in order to report out as Incumbent Registered Apprentice.	The Department appreciates this comment in support of the change.	1
158.	NEW element - Armed Forces Service Medal Veteran - Armed Forces Service Medal Veteran – this medal is for those who served in an operation and did NOT encounter a hostile threat. This is different than the AFEM, Armed Forces Expeditionary Medal, which holds the value of combat service. Was it supposed to be the AFSM Veteran versus the AFEM Veteran? I don't understand the logic why the AFSM is tracked.	38 U.S.C. § 4212 outlines the requirements to refer qualified covered veterans to certain employment openings. 38 U.S.C § 4212(a)(3)(iii) identifies Armed Forces Service Medal Veterans as a covered veteran.	1
159.	NEW element - Criminal Justice ID number/Inmate number - 1) What program is this column required for? 2) Is this only going to be specific to the QUEST DWG LTU category definition: are currently incarcerated offenders within 1 yr. of release?	As indicated in the document containing these proposed changes to the ETA-9172, this new element is proposed to be collected for only the Reentry Employment Opportunities (REO) Adult and Youth) programs.	1
160.	NEW element - DWG grant number #2 - How does this change impact populating PIRL elements 105,106 and 107?	See response to PIRL comment #146	1
161.	Date of First DVOP Service - Will this field just reflect DVOP staff or will it also include the new consolidated staff?	Consolidated DVOP/LVER staff, when providing services to participants, are working as a DVOP. Therefore, the date of first DVOP service would also include Consolidated DVOP/LVER staff.	1

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162	New DE - Date of First DVOP Service Is this also the JVSG program begin date?	Yes	1
163	NEW element - Gang affiliation - 1) What program is this column required for? 2) Is this item really necessary? Can offender status be a one-catch-all?	As indicated in the document containing these proposed changes to the ETA-9172, this new element is proposed to be collected for only the Reentry Employment Opportunities (REO) Adult and Youth) programs.	1
164	In relation to the new Gender Identity Data Element, CA would like further clarification on the definitions and differences between Code Value 3 and 4. Is Code Value 3 including non-binary gender identities and Code Value 4 is any gender identity that is not Man, Woman, or non-binary?	This is an accurate interpretation. Code 4 is meant to capture those individuals who identify as a gender that they feel is not captured by the options in codes 1-3.	1
165	New Sex/Gender Identity/Sexual Orientation PIRL elements: Apprenticeship grants are not intensive case management programs. These data elements seem intrusive to collect for all apprentices when many participants are enrolling for a short period of time for limited services (such as work boots).	See response to PIRL comment #11.	1
166	New Sex/Gender Identity/Sexual Orientation PIRL elements: We agree with the inclusion of code element "9 - Participant did not self-identify" because this element may be viewed as intrusive.	The Department thanks commenters for their support of this change.	1
167	Gender Identity and Sexual Orientation are included in the reporting for Reportable Individuals. It is not possible to collect this information for Reportable Individuals since this information is pulled for reporting entirely from RAPIDS. We would have no choice but to enter 9's for every reportable individual since these are individuals that are in RAP's that were developed using grant funds.	The Department appreciates that there will be certain circumstances when the information requested in these fields is not disclosed or not available, and notes that there are many circumstances and programs where this information will be available and does get disclosed. As with all demographic fields, the Department will include this information as an element for reportable individuals to ensure that when such information is obtained it can	1

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	These are apprentices we never have direct contact with and we report on them solely through RAPIDS data. Reporting anything other than 9-declined to self identify is not realistically possible since that information is not included in RAPIDS.	be reported.-	
168	New fields added at bottom (Gender Identity and Sexual Orientation): Why are these needed to be reported in PIRL and what is the purpose. How one identifies has nothing to do with helping one find a job. What does one’s sexual orientation have to do with finding work? These questions are becoming more of a census tract information then a job training placement program. Many feel that these will open up staff to legal issues. The time it takes to change the system to collect this and appropriately report is one issue, while the other is many will not even disclose. Sexual Orientation and gender identity does not belong as a reported field. People could view these fields as a tool to discriminate. In addition, to ask youth these questions could be harmful while these individuals are still determining themselves. Will these fields eventually affect funding for the programs requiring these new fields?	As stated in the response to PIRL comment #11 above, the addition of these fields is tied to, in part, requirements in appropriations that the performance of some of these programs be disaggregated by fields that were not previously collected, including gender identity and sexual orientation. The Department will provide technical assistance on the collection of these elements, and notes that individuals are able to choose not to disclose this information.	1
169	New elements for gender identity and sexual orientation. Tennessee is not sure why these questions needed to be reported in PIRL and what purpose they serve. Do we know how a participant’s sexual orientation will be used for analysis for federal funded programs? Tennessee also has concerns that asking these types of questions to all participants can open the state up for discrimination lawsuits and other issues that if not mandatory we would prefer to	See response to PIRL comment #168.	1

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	not ask.		
170.	NEW element - Gender Identity - Including both choices 3 and 4 in the gender identity element is confusing. Two-spirit gender identities belong with choice 3 ("not exclusively man or woman"), and not sure why we would specify two-spirit in a gender identity question and not mention any other traditional non-binary gender identities, particularly from regions that send large numbers of immigrants to the U.S. (muxe in Mexico, hijra in India, etc.).	The Department appreciates this comment and notes that the specific examples in each code's definitions are not considered an exhaustive list. With respect to the inclusion of a code value 3 and 4, the Department notes that this is considered by many to be a best practice in collecting data on gender identity, as there are some communities with gender identity concepts that are not viewed by those communities as falling under the definitions of man, woman, or non-binary, and therefore there is a code value 4 included in order to be inclusive of such identities.	1
171.	NEW elements - Sexual Orientation and Gender Identity - WI-DWD-DET requests more details on the purpose of collecting these data elements, supporting legal language, and training materials on best practices and sensitivity when collecting this information.	See response to PIRL comment #168.	1
172.	Gender identity will not be used in determination of Selective service or in determination of eligibility or reporting and may cause incorrect data collection. Any additional fields that must be collected will increase the already significant application process and are unnecessary	See response to PIRL comment #168.	1
173.	New Data element XXXX-New Gender Identity. Commenter team suggests Gender data values as 1=Male or 2=Female rather than Man/Woman... Commenter request clarification on "Two-Spirit" definition or remove the reference to "two-spirit" as this terminology is not widely used within the community.	See response to PIRL comment #170.	1
174.	NEW elements- Gender Identity and Sexual Orientation - This seems "intrusive" and somewhat redundant.	See response to PIRL comment #168.	1

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175	NEW element - HVRP ID - Too burdensome to collect for WP participants.	The Department withdraws the proposed addition of the Homeless Veterans' Reintegration Program Participant ID data element.	1
176	HVRP ID - will this number be verified against any DOL Database. does DOL maintain the application and can provide a webservice to validate? This will be difficult for staff to collect and report correctly if nothing to verify	See response to PIRL comment #175.	2
177	HVRP ID - what is the purpose of gathering this information from a federal reporting purpose?	See response to PIRL comment #175.	1
178	XXXX - NEW Date Started Registered Apprenticeship Program (Incumbent Registered Apprentice) We will need clear guidance for incumbent registered apprenticeship definition	See responses to PIRL comments #174-176	1
179	New DE - Last Branch of Military Service For Service members who previously served on Active Duty then transitioned to a National Guard position will the Active Duty period not be recorded? Do we need to document multiple periods of service?	Only one period of service should be reported. Record the most recent last branch of military service.	1
180	New DE - Off-Base Transition Training Participant Will this question only apply to Transitioning Service Members?	No, this may apply to other participants as well. Off-Base Transition Training is open to veterans, veterans currently serving in the National Guard and Reserve, and their spouses.	1
181	XXXX - NEW Sexual Orientation As intermediaries serving (minor-aged, under-18 youth) this question is not relevant to our work. It is, again, sensitive data and youth apprentices may not yet feel comfortable answering this	See response to PIRL comment #168.	1

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	question with new contacts or on a form, so data may be inaccurate. This would also create additional burden in data collection and storage to collect information that is typically shared (in rare occasions) on an as-needed/conversational basis.		
182.	NEW element - Sexual Orientation - Why is this data element necessary? It feels like seekers may question why identifying their sexual orientation is important to being provided services. It could also perhaps lead some seekers that are denied entry into a program due to not meeting eligibility requirements to rather think that it was due to their sexual orientation.	See response to PIRL comment #168.	1
183.	Sexual Orientation will not be used in determination of eligibility or reporting. Any additional fields that must be collected will increase the already significant application process.	See response to PIRL comment #168.	1
184.	New Data element XXXX-New Sexual Orientation. Commenter team suggests in "Record 9 to remove verbiage of "identity" from "Sexual orientation/identify in description. What is the purpose to collect this element? Is it required? What benefit is there to collect this information.	See response to PIRL comment #168.	1
185.	NEW element - type of training while incarcerated - 1) What program is this column required for? 2) Is this only going to be specific to the QUEST DWG LTU category definition: are currently incarcerated offenders within 1 yr. of release?	As indicated in the document containing these proposed changes to the ETA-9172, this new element is proposed to be collected for only the Reentry Employment Opportunities (REO) Adult and Youth) programs.	1
186.	The WAI deeply appreciates the modifications made in the updated Performance Accountability proposal including: adding "Union	The Department appreciates the comments in support of this change.	1

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	Membership” and adding “Registered” before “Apprenticeship” as categories of reporting for WIOA and all grantees who are required to complete the DOL Participant Individual Record Layout (PIRL) (ETA-9172) and Quarterly (Program) Performance Report (QPR) (ETA-9173) Both of these modifications will help provide additional and critically important information on participant outcomes as well as Registered Apprenticeship programs.		
187.	NEW element - Union membership - What program is this column required for?	As indicated in the document containing this proposed change to the ETA-9172, this new element is proposed to be collected for only the Reentry Employment Opportunities (REO) Adult and Youth) programs.	1
188.	we strongly recommend DOL add “union membership” as a category of reporting for WIOA and all grantees who are required to complete the DOL Participant Individual Record Layout (PIRL) (ETA-9172) and Quarterly (Program) Performance Report (QPR) (ETA-9173).	The Department appreciates this comment, and has determined that it will not collect this element for any additional programs at this time. The Department will monitor and analyze its implementation and collection, and decide in the future whether to propose adding this element to other programs’ collections.	1
QPR (ETA-9173) – Common QPR			
1.	We urge the Employment and Training Administration to reduce the weight of the job placement metric for programs that serve job seekers with significant barriers to employment. We offer more insight on how this metric can encourage some state programs to not target these communities. Comments\comments from 2023 publication\Public Comments\categorized\WIOA	The Department thanks commenters and notes that the performance metrics and their weights are set in WIOA statute and are therefore are not something that most of the programs covered in this collection have flexibility to make such changes. The Department also notes that when goals or targets are set for grantees, the Department strives to take into account for the barriers faced by the participants being served by grantees, and many of the programs under this collection explicitly adjust those targets through the use of statistical adjustment models that account for participant characteristics and economic	1

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	Comment 88 FR 66901 Young Invincibles.pdf	conditions.	
2.	We support the change to update the time period from “Program to Date” to “Program Year to Date” on Form ETA9173. This change will help to track progress more easily toward achieving annual performance measures. We support the change to remove the “Total Previous Period” column.	The Department appreciates the comments in support of this amendment.	1
3.	CA suggests adding “Other” sex and “Did Not Self Identify” to the QPRs to mirror the updates to the WIOA Statewide Performance Report Template and WIOA Local Performance Report Template (ETA-9169).	The Department appreciates this suggestion and has added this to the QPR to align these categories to the ETA-9169 template.	1
4.	Element 201 – Sex, New Element – Gender Identity, New Element – Sexual Orientation The proposed updates and new elements encompassing assigned sex at birth, gender identity and sexual orientation are not pertinent to program eligibility or successful case management to a participant and may prevent participants from registering for services due to the invasive nature of the questions. It seems like this is beyond the scope of WIOA to collect this information. If implemented, we strongly encourage that states have the option to not collect the gender identity and sexual orientation elements. While the questions may be intended to be non-discriminatory, the questions come across as excessively intrusive because participants are coming to us for services unrelated to the questions being asked.	See response to PIRL comment #168.	1
5.	CA suggests updating the “Total Current Period” column on the Youth QPR to “Total” to mimic the QPR for other programs.	The Department appreciates this suggestion and has made this change.	1

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6.	NC appreciates the elimination of the Total Previous Period columns on all QPRs and greater clarity around the common exit status of each program.	The Department thanks the commenters for their support of this amendment.	1
7.	Total Previous Period. Commenter team appreciates removal of Total Previous Period as this provides a deceptive result. Because the PIRL regenerates each day, the Total Previous period really is Total Previous Period (updated) reflects data that may have been updated from the prior submission. We agree with this update.	The Department thanks the commenters for their support of this amendment.	1
QPR (ETA-9173) – Apprenticeship QPR			
1.	QPR - AP - It appears that Total Pre-Apprentices (A. 1a. and A. 4) and Total Apprentices (A. 1b. and A. 5) are listed twice. This appears repetitive and there were no specifications for A-4 or A-5. Clarification as to the definition of these elements would be beneficial. If they are repetitive in definition, we would recommend removal of the duplicated elements. Comments\comments from 2023 publication\Public Comments\categorized\WIOA Comment 88 FR 66901 Young Invincibles.pdf	The Department agrees with the commenter's suggestions and has removed the duplicate lines from the template.	1
2.	Apprenticeship specific (see full comment for details) - We urge the Employment and Training Administration to apply more weight to the earnings performance metric. We offer further suggestions to restructure it so that it reverses occupational segregation in the registered apprenticeship program. Comments\comments from 2023 publication\Public Comments\categorized\WIOA Comment 88 FR 66901 Young Invincibles.pdf	The Department appreciates the commenter's concerns and declines to apply any specific weights to different performance indicators at this time. To maintain greater alignment with other workforce programs at ETA, the Department will not apply specific weights to any performance indicators. The Department always strives to hold grantees accountable to all of their performance indicators, while also taking into account the context around each grant as appropriate.	1
3.	QPR - AP --Program to Date column. All program to date references (AP Adult, AP Youth, and other DWG or grants, etc.) should be sure to include the time period of the life of the grant to ensure the PIRL	The Department notes that the "program to date" calculations will utilize records going back as far as the beginning of the grant. While grantees often only include approximately 2.5 years of data in the files they upload in WIPS, this is not a WIPS restriction, but rather a	1

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	continues to include all records in the grant. Currently the PIRL includes approximately 2.5 years worth of data (participant and exiter/outcomes data) and therefore for grants that extend beyond 2.5 years where the participant exited prematurely or at the beginning of the grant may not be included in "Program-to-date" numbers (life of the grant). There is much value in utilizing the PIRL and these aggregate reports to include accurate "Life of the grant" or "Program to date" data on the grant. We agree with removing "Program to date" however there is value in having a report that provides for the "Life of the grant."	choice made by grantees to trim old records out of their data files. This ends up with some grantees including about 2.5 years of data because in order to have a "rolling 4 quarters" calculation for all of the performance indicators, the file must include the current quarter's participants and the exiters going back 10 quarters. Apprenticeship grantees should not trim old records from their file so that a true program-to-date value can be calculated.	
4.	Apprenticeship specific (see full comment for details)- We urge the Employment and Training Administration to collect data on program performance in a disaggregated form considering race, ethnicity, and gender. We offer insight on how this might help the agency reveal problems with wage rates in programs across the country. Comments\comments from 2023 publication\Public Comments\categorized\WIOA Comment 88 FR 66901 Young Invincibles.pdf	This data collection does collect and disaggregate data by various demographics. In addition, the Department can conduct additional analyses using the individual records reported to the Department in order to glean insights such as those mentioned by the commenter.	1
5.	Apprenticeship specific (see full comment for details) - We urge the Employment and Training Administration to consider implementing a Racial Economic Mobility Metric to WIOA performance indicators, specifically considering earnings and job placement rates. Comments\comments from 2023 publication\Public Comments\categorized\WIOA Comment 88 FR 66901 Young Invincibles.pdf	The Department appreciates the commenters suggestion and declines to implement any new metrics in this data collection at this time. The Department will take this suggestion under advisement as a part of its own analyses of the data.	1
QPR (ETA-9173) – DWG QPR			
1.	QPR - DWG - Total Previous Period. Commenter team appreciates	The Department appreciates this comment in support of the change.	1

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	removal of Total Previous Period as this provides a deceptive result. Because the PIRL regenerates each day, the Total Previous period really is Total Previous Period (updated) reflects data that may have been updated from the prior submission. We agree with this update.		
QPR (ETA-9173) – INAP QPR			
1.	for the Indian and Native American Performance Reports (ETA-9173): (1) new program-specific versions of the ETA-9173 Quarterly Performance Report (QPR)—INAP Youth, and (2) updates to the ETA-9173 Quarterly Performance Reports (QPR)—INAP Adult. In review of the report templates, the Performance Section D Program Year to Date period is unclear. For instance, the cohort period for the program year to date section of the performance indicators is not clear on the report form. Additionally, wage record results are not available for this period; however, there is a field on the template for this information. To improve the form, can the reporting template be enhanced to make the performance periods and results clearer and more meaningful to the program. Improving the form will make the performance results more understandable, especially when reviewing and sharing UI wage record results.	The Department appreciates this comment in support of the change to the report templates and provide additional technical assistance to grantees as this change is implemented to better understand performance reporting. The Department is also making additional changes to the INAP Youth QPR in response to this comment to enhance clarity, including additional breakouts for the WIOA performance indicators.	1
2.	In review of the report templates, the Performance Section D Program Year to Date period is unclear. For instance, the cohort period for the program year to date section of the performance indicators is not clear on the report form. Additionally, wage record results are not available for this period; however, there is a field on the template for this information.	The Department appreciates this comment in support of the change to the report templates. See response to previous comment.	1

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	To improve the form, can the reporting template be enhanced to make the performance periods and results clearer and more meaningful to the program? Improving the form will make the performance results more understandable, especially when reviewing and sharing UI wage record results.		