General Questions

**Question:** How should we report on non-binary individuals who do not identify as male or female?

**Answer:** The Data Element Definition/Instructions for PIRL 201 (Sex) offers three options:
- Record 1 if the participant indicates that he is male;
- Record 2 if the participant indicates that she is female; and
- Record 9 if the participant did not self-identify their sex.

At this time, these are the only code values available for this data element. Therefore, ETA recommends that grantees draft their intake forms to reflect the two options available, and if the individual chooses to not identify, then record a 9.

**Question:** If a participant gets an RTI service under one grant and a supportive service under another grant, should we submit two records in the PIRL, since there is only one grant number per line in PIRL 2920?

**Answer:** Any grantee utilizing the Apprenticeship schema should contain the information for the service(s) received by each individual to be reported for a single grant which are provided by that grant or the other funding sources indicated in a data value selection. All individual records should contain the same grant number on any given file if you are using the Apprenticeship schema. Only State WIOA reporting agencies utilizing the full PIRL schema or SIRS schema can mix grants on a single upload file.

**Question:** How do we handle differences between RAPIDS and WIPS demographic categories?

**Answer:** RAPIDS and WIPS are two systems built for different purposes. Per the ASE TEGL (ETA-TEGL-17-18), RAPIDS is not a source for grant-related reporting because of some of these differences. Additionally, RAPIDS is neither a case-management, a grants-management nor a reporting system. All future performance reporting for apprenticeship grants will be reporting via WIPS. Therefore, for the purpose of apprenticeship performance reporting, it is necessary for grantees to develop and/or procure a suitable grants-related system (MIS).
**Question:** Does WIPS do data validation for us or are we required to track it in our internal case management system?

**Answer:** WIPS does have internal ‘edit checks’ to ensure that the submitted data does conform to the standards outlined in the PIRL, the Valid Values, the Logic Rules and the Duplicate Rules. WIPS does not, however, maintain records in any way to satisfy data validation and primary documentation requirements for monitoring purposes. For additional information see more information on data validation in TEGL 23-19 and the Core Monitoring Guide (available at a link at https://www.dol.gov/agencies/eta/grants/resources).

### Data-Element Questions

**Question:** OBS number – what is it? Do we generate this number? Or do we record 000000000?

**Answer:** The OBS number is analogous to an auto-generated ID number which the grantee assigns to each line reported. It can change with every file, and serves to help identify errors during the edit check process. The value is ‘IN 9’, so it must be 9 integers long, and non-duplicated in each file.

**Question:** PIRL 100 (Unique Individual Identifier): Do we generate this number?

**Answer:** This number is generated by the grantee and assigned to each participant, analogous to a KEY-ID. This number should remain the same for any participant across each quarter that the participant is reported.

**Question:** PIRL 802 (Low Income Status at Program Entry): How do you recommend gathering this information given that some of our participants may not know the answer to this question at entry?

**Answer:** The apprenticeship PIRL instructions indicate, “PIRL 802 is a required element. Participant self identifies as to status immediately prior to enrollment as a participant.” ETA recommends that grantees include this as a question at intake. By and large persons who do qualify for this designation are aware that they are receiving services under one of the 10 designations (included in the PIRL definition) regardless of age.

**Question:** PIRL 905 & 913 Youth (WIOA) & Indian and Native American Programs status - WIOA: How do you recommend gathering this information given that most of our participants will not know the answer to this question?

**Answer:** The Apprenticeship PIRL instructions indicate, “Apprenticeship grantees can leave this field blank if this information is not known.”

**Question:** PIRL 935 (Accountability Exit Status): What does this mean?

**Answer:** This data element is only required when PIRL 2700 (Social Security Number) is left blank, to indicate the reason why the Social Security number is not included.
**Question:** PIRL 1300 through PIRL 1318. For each such service, we are to specify the Type of Training Service. It is our assumption that both OJT and RTI training services for pre or registered apprenticeships are to be reported under the above data element. Currently, there are 12 different values for the type of training, ranging from 01 (OJT) to 12 (Job Readiness Training in conjunction with other training)

**Answer:** Pre-apprenticeship is not considered a training service, but is captured in data elements 2901-2906. For Apprenticeship grants, OJT would be reported as 01, RTI would be reported as 09.

**Question:** PIRL 1328 (Distance Learning): What does training include - CTE courses? OTJ training? Would remote work or high school classes count?

**Answer:** Yes.

**Question:** PIRL 1807 (Date of most recent measureable skills gain = postsecondary transcript/report card): Can you please clarify how we should utilize the report card or transcript to determine whether the participant is meeting the State's academic standards? We do not know what the standards are, where to find them or how we can verify if a participant is meeting them.

**Answer:** Generally accepted norms of letter grades A, B, or C are meeting academic standards. Confirmation of standards would be ascertained through communication with the educational provider to track the participant’s progress, which is a part of generally accepted grants management practices.

**Question:** PIRL 1810 (Date of most recent measureable skills gain = Skills progression): Can a registered apprenticeship program’s measures of occupation-specific competency attainment and progression count as the basis of evidence for this question?

**Answer:** Yes.

**Question:** PIRL 1900 and 1901 - Youth 2nd Quarter Placement (enrollment in skills training/education outcome) Does 2nd and 4th quarter refer to after exit?

**Answer:** Yes.

**Question:** PIRL 2414 (Date released from incarceration): If "leave blank" implies the participant is currently incarcerated, what do we record to indicate that this doesn't apply because the participant was never incarcerated?

**Answer:** DOL would only expect to see this data element utilized for Apprenticeship grants if the participant were incarcerated at the time of participation as indicated with a ‘1’ value in PIRL 2413. All others should record a ‘0’ in PIRL 2413, and leave PIRL 2414 blank throughout the individual’s participation.
**Question:** PIRL 2700 (Social Security Number) Record the Social Security Number (SSN) assigned to the participant: Given the sensitivity of collecting and regularly transmitting this information, is this required?

**Answer:** Yes, all grantees must ask every participant for their social security number, and report it taking all precautions to safeguard the information as required by the terms of the grant agreement. Upload into WIPS is a secure transaction. Transmission of these types of information through unsecured methods is prohibited as discussed in the webinar series. The onus is on all grantee staff members and partner staff members to ensure the security of all participant PII.

**Question:** PIRL 2900 (RAPIDS Number): What should we enter for the RAPIDS number? Will DOL validate it?

**Answer:** The apprenticeship PIRL instructions state, “PIRL 2900 is a required element for every participant Registered in an OA State or SAA State which utilizes RAPIDS”. The published size currently showing on the WIPS page is erroneous at ‘AN 10’. Through a non-material change DOL is requesting this element be 12 characters, and the change has been completed in WIPS. DOL will conduct random validations throughout a program’s period of performance, and at the request of FPO’s in relation to grant monitoring.

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**Program-Specific Questions**

**Question:** Is there still the "other individuals served" for ASE grantees? Those apprentices that have been registered but not an actual service to offset costs?

**Answer:** The ‘other individuals served’ outlined in the ASE Grant Officer letter of June 2020 are only those individuals who join a program developed with ASE funds, thereby receiving a ‘macro’ service instead of an individual service. This approach is still in effect with ASE grants. Additionally, this applies only to those who would otherwise be considered participants under this ‘umbrella’ service methodology and not the general statewide population of registered apprentices.

For other program specific performance questions, please send to your program mailbox:

- **ASE/SAE2020:** apprenticeship.grants@dol.gov
- **YARG:** youthasready.grants@dol.gov

For other data-element specific reporting questions, please send to

- **OAGrants.WIPS@dol.gov** and cc your FPO