**WorkforceGPS**

**Transcript of Webinar**

**H-1B Performance Reporting Orientation 1.0, H-1B Rural Healthcare and H-1B One Workforce Grants**

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*Transcript by*

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GRACE MCCALL: And welcome to H-1B Performance Reporting Orientation 1.0, H-1B Rural Healthcare and H-1B One Workforce Grants. So without further ado, I'd like to turn things over to today's moderator, Ayreen Cadwallader, workforce analyst, grant program lead, United States Department of Labor, Employment and Training Administration. Take it away, Ayreen.

AYREEN CADWALLADER: Thank you so much, Grace and good afternoon everyone. Certainly good morning to those of you on the Pacific Coast. I'm very excited to hear from you today and for us to share and roll out our performance reporting policy guidance for the Rural Healthcare and the H1-B One Workforce grants. We did – thank you for participating in the poll earlier today. We did see a strong – a showing of program directors and managers on the call.

Certainly the authorized representative, happy to have you. And then we did see some IT folks on the call as well as some of your partners of the grants interested in listening in to our performance webinar. Also excited that we have a strong showing of our prior H-1B grant programs, ready to work with one that really stood out for me since that's one of the grants I've worked on before. But there was also a strong showing of grantees that have other department of labor grants so certainly welcome. Welcome that you're new to the H-1B grant family. But for those of you – and again, we do have some repeat grantees to hopefully this information would be a refresher perhaps. I will turn it over to my colleagues to introduce themselves really quickly. This is the performance team here at the division of strategic investments. Kristen and Greg.

KRISTEN MILSTEAD: Hi everyone. My name's Kristen Milstead and I've worked with Greg and Ayreen for quite a while. I've worked on Scaling Apprenticeship grants [inaudible] and I'm excited to work with you on these grants.

GREGORY SCHEIB: Awesome. And this is Greg. It's nice to be with you all today. Along with being a colleague with Kristen and Ayreen, I'm the lead for the America's Promise Grant currently and we do a lot of performance work, and it's nice to see a lot of familiar faces, folks who have had grants with us in the past. And of course, happy to have some of you who may have not worked with us before, so thank you very much. Ayreen, you're still with us?

MS. CADWALLADER: Sorry about that, Greg. I was still on mute. All right, here we are. Wanted to run through the agenda and our objectives for today and some of the things that we wanted our grantees to get out of the key H-1B performance policy guidance. Our goal is to really provide an overview, our policy guidance and the H-1B quarterly progress report requirements. And then also what grantees should be doing our guidance for the quarters ending March 31st, 2021, for which you are currently reporting and then upcoming quarters, quarter ending June 30th early this summer.

We do want to provide a brief introduction to the Workforce Integrated Performance System, what we call WIPS. So again, as part of our interim guidance, we'll let you know in the next upcoming slides, but the key reporting documents that you'll be submitting is the quarterly narrative report. So we'll go over that as well as how you access WIPS and how to submit that QNR in the WIP System.

Lastly, we do want to go over briefly our participant data collection and tracking requirements. This is for performance policy guidance for the quarter ending September 30th, 2021, so later this fall. We want to go over some of the H-1B real-time and the Workforce Innovation and Opportunity Act or WIOA performance measures. And then certainly a quick overview of the participant level data that you will track and collect to generate the quarterly performance report in WIPS.

So – the main chat is open for everyone to drop in your questions, and we are happy to respond to them as we have – as we're presenting, but there are also quick breaks in the presentation to answer your questions. With that, I'm happy to turn it over to Greg.

MR. SCHEIB: Thanks, Ayreen and Grace, you can go ahead and move it onto the next slide if you don't mind. So appreciate again being with all of you today. I'm going to go over some of the basics with you. So as part of your grant agreement, of course, you guys are required to submit quarterly progress reports to ETA each quarter. They're always due 45 days after the end of the reporting quarter.

So for this month, the quarter ended March 31st, the upcoming report is due May 15th. So every quarter, you're going to be submitting two reports. You're going to be submitting a quarterly performance report and a quarterly narrative report. The quarterly performance report provides aggregate level data on the participants that you're serving and reflects all the activities through the end of the quarter that you're reporting on.

And again, this is going to be based on the information you collect about your individual participants and then end up reporting into the WIP System. The other piece, which for right now is probably more pressing for everybody is the quarterly narrative report that provides a narrative of the grant activities that occurred during the grant reporting quarter. And those are also reported in WIPS each quarter and later in the presentation we'll dive deeper into that.

Next please, Grace. What you see here is just a list of the quarter end dates and the due dates each quarter. You can see they change a little bit one day, sometimes on the 15th sometimes are on the 14th, but do make sure you take note of those. We'll of course be providing lots of information and heads up prior to the reporting quarters.

So if you can go ahead and move on to the next slide, Grace. Appreciate it. So we've already sent out some of this information, but just want to go over it again just to make sure everybody's on the same page. For the quarters ending March 31st, this quarter and next quarter which is the quarter that ends June 30th, you will only be submitting a quarterly narrative report. You guys do not currently have the ability to submit a quarterly performance report into WIPS.

The quarterly narrative reports are going to be submitted to ETA using WIPS each quarter, and again, the first one's going to be due this May. And of course we're going to be talking about WIPS access and those will be happening this week. You won't submit a participant file like those of you that have had H-1B grants recently and use WIPS know this process, but you were – you're not going to be submitting a file this quarter and you won't be submitting a file next quarter.

After the quarter ending September 30th, which will be the November 15th reporting quarter, you will be able to submit both a quarterly narrative report and a quarterly performance report. I'm going to go ahead and move on to the next slide, Grace. So I'm just going to do a little quick knowledge check with you right now. So Grace is going to put up a poll and you can see here, for the performance reporting quarter ending March 31st, our H-1B grant program will submit (a) and pick the answer you think is the best one.

So I'll give you guys just a second to see. Looks like they're getting – like the majority of you are getting the right answer which is that you will be submitting your quarterly narrative report into WIPS this quarter which you may not be – may be a little surprised by [inaudible] some of you probably don't have your accounts yet, but never fear that will happen very shortly.

So I'm going to go ahead and move on to the next slide, Grace, if I could, and then you can move past that one as well. So again, we're just going to talk a little bit. I'm going to walk you through a little bit more about what the – more about the narrative report. Again, many of you are going to be familiar with this from past H-1B grants. And so it won't be a – some of this will be old news to you, but we'll go over it anyway for those of you that may not have worked with this before.

So again, so starting this quarter, you're going to submit quarterly narrative reports. And again, the quarterly narrative reports kind of a qualitative summary of the grant activities that occurred during the reporting quarter status updates and program activities, participant information that maybe you can't otherwise reflect in the quantitative data that you're going to submit with your QPR. You can also describe any activities or events, partnerships, successes, success stories, things of that nature.

Sometimes folks will post press that they get from their local media, things like that. It's all good. We always like to hear and get a sense of what's going on with your individual programs. Next slide, if you don't mind, Grace. So the quarterly narrative report collects a lot of different things. It's broken up into the sections that you see here and you're going to provide information and all these things, program strategies, how well your model is meeting its intended purpose, the lessons learned, status updates on if you – and you don't have much, but if you have leverage resources, you can talk about that here. Strategic partnership activities, employee engagement, all sorts of things.

So the point is, we want to get a good, clear, detailed picture of where your grant is, both the successes you're having and also if there are issues or technical assistance needs that you have. This report goes not only to us here in the national office, but of course it also goes to your federal program officer and they can work with you as well to provide you assistance if you need it.

Let's see. So yeah, again, there's sections to report all sorts of things. One of the things that we're going to go to into a little bit is some of you may be starting to serve participants this quarter. I imagine it's a fairly small number, but I think we were a little surprised in our initial grantee orientation webinar that some folks were already kind of starting to work with some participants and that's totally fine.

Since you won't be submitting a quarterly performance report this quarter and next, you can certainly put – and we would encourage you to put your – some of your basic performance or basic outcomes in there, how many people you're serving, things like that. You can take a look at some of the performance outcomes that we're tracking as sort of a guide for that. I'm just going to go ahead and move on to the next slide, Grace.

So before we get a little deeper into the narrative reports, just a reminder that WIPS has two types of user accounts. You can – there is a level one, what we call a Certification Account and we give that out just mandatory. We just give that by default to the authorized rep for each grant. The authorized representative can also request a second account for another staff member. And that account will just simply – that is sort of, we call that an upload account and you can upload files. You can edit and put in data, but you can't – the only function you don't have is you can't certify the report.

The expectation is that the authorized rep every quarter is going to take a look at the reports and they'll be the final person to submit the reports each quarter. Just as a reminder, we obviously had asked this last quarter for you all to reach out to us if anybody did need a level 2 account. You don't have to have one. It's not mandatory. But if you've decided you want to do that, that is perfectly fine.

If for some reason you have not requested that already, you can still do that this week and we can get out the account, but again, please do be reminded that we only give out to two accounts. One account to the authorized rep so they can certify the reports and a separate one, the level two account for another staff person or a team who can use it to upload the files, do the quarterly narrative report and get that finalized.

So the last part about this, we are going to be sending out those – those accounts are going to be going live after this webinar and through the end of this week, so do please check your emails. It comes in from an email account that's – and then maybe someone could put this in the chat for me, Jessica is admin@dol.appiancloud.com. You might want to put that in your favorites or check your spam or your junk mail. Sometimes those emails will end up there.

But that's where you'll get your initial account and your temporary password. You do need to go in there within five days and activate it, pick your new password, otherwise you'll have to come back to us and ask us to reset it again. Yeah, you're anticipating. I'm moving way ahead of myself on it. Yeah, I think we've covered all of this.

Let's just go to the next one, Grace. So once you do get your password and you're into the WIP System, if you do need to reset your password, you can do that on your own. This is a screenshot of how that works and you can go in there. If you do have technical issues using the WIP System, there is a place where you can put in a service request or a ticket for that.

If you do have policy questions, however, things that are more policy about, who's a participant, things about co-enrollment, whatever, anything like that, you'll want to send those directly to the program mailbox, either the one workforce mailbox or the Rural Healthcare so we can answer your questions, get you the information you need.

Go ahead and change the next one. One thing and it's already come up with a number of the grants is that, we do only give one certifying account out to the authorized representative so it is important that if your program has changed who the authorized representative is on the grant, make sure you're in touch with your FPO right away.

The modification itself is pretty straightforward, but it's important that you get that done because we don't give out the new account till we know who the authorized rep is and that they're formally in that role. You can go ahead onto the next one, Grace. So once you do log into the WIP System, this is just an example of what you'll see. This is how it's going to look.

Go on to the next one. So again, this quarter there's a lot more detail and we're going to go into a lot of detail on the second, third webinar in this series. But right now, we're just going to focus on the narrative report because that's what you need to be focused on leading up onto May 15th.

So what's going to happen is, once you get into the WIP System, you're going to my report – to the, my reports tab, and then you're going to select the quarterly narrative reports. You're going to enter the grant program information in the fields provided. You're going to select the correct quarter end date which will be 3/31/21. You're going to select the grant program name from the dropdown list and then the grant number and then hit the save button and then move on to the next sections.

Go ahead and go to the next one, Grace. There's some information to fill out that you'll want to put in here. The name of the grant, the grant recipient name, program name, all these other things that you'll fill out. It's pretty straightforward. Email address, phone number, contact, things of that nature. And then after that, you're going to continue to move through and save as you go. Then in the section 2 through 11, you're going to enter the information, and you can move to the next slide, Grace, if you don't mind.

You can – you'll go through each of the sections of the quarterly narrative report and you'll drop in your responses for each one. The WIP System basically has all the instructions that needs to go in every section and I should also point out that in the file share that you've got available through the webinar, you can download both a PDF version and a word version of the quarterly narrative report.

You'll want that quarterly – you'll want that Word version of the quarterly narrative report because the best way to complete the narrative report is to do it all in Word and then copy in the sections into WIPS. We've had people in the past who try to compose their narrative report in WIPS, and if they forget to save it, they end up losing whole sections worth of data and then have to go back and try to recreate it, so it's a real pain in the neck.

So what we'd encourage everyone to do the report in Word and then cut and paste these sections into the appropriate places. I would also just add here that we don't allow folks to just say, see attached and attach a PDF version of the narrative report. And the reason we do that is because we want to be able to download all the responses. It makes it easier for us to analyze each of the sections and also to kind of tease out any technical assistance needs things like that. So if we get one in and it says, see attached in these different sections, we're just going to come back to you and tell you to resubmit it.

Go ahead and go onto the next slide if you don't mind. See [inaudible]? Okay, here we go. So you're going to fill out the whole thing, once you've completed the QNR and you verify that the information is accurate. The authorized rep with their account is going to indicate the reports file and they're going to hit the certified button and that's going to let us know that it's submitted and ready to go.

Again, certifying the report indicates that the grantee has – the grantee [inaudible] representative has reviewed and certified the data is accurate and true and accurate. You can submit attachments to the quarterly narrative report. You can do that through a – there's a button for attachments, and you can attach those typically that's some – either something like a chart or a diagram that you want to share that can't otherwise really be put into the text fields.

It might be a media story, something like that, a success story, things of that nature. We're always happy to get those as part of your submissions if they're appropriate. Go ahead and keep moving along. And then this is just an example, and those of you that have worked in WIPS this should be familiar. This just – there is a quarterly narrative report in dashboard for yourself and it will tell you – it will tell you when your report has been submitted.

We get the same report on our end so we can tell if the narrative reports have been submitted and if we don't see it come in by the 15th, we'll certainly ping in, see where you're at with it. Gosh. Okay. That was quite a bit, but I think we're going to take a little break if you want to go ahead and go onto the next slide. Ayreen, I'm just going to pass it back to you and see if we got any questions while we were talking.

MS. CADWALLADER: We actually have several questions that I know – can you guys hear me okay?

MR. SCHEIB: Yeah, we're good, Ayreen.

MS. CADWALLADER: Excellent. I've got a couple of questions in the chat window. I did want to read [inaudible] them really quickly so that everyone is on the same page. The first one is, will there be any more data elements as was the case with a TechHire what we call one of our legacy [inaudible]. And the answer is no. And the data elements that [inaudible] for our H-1B PIRL schema and PIRL – and we'll get – we'll revisit this again, so you're going to hear this multiple times.

PIRL stands for the Participant Information Record Layout. The PIRL is currently under revision as it's going through the OMB information collection request renewal for all of ETA. And so we do plan to release the revised H-1B PIRL schema to the grant to Rural Healthcare and One Workforce grantees within the next few weeks, but please be on the lookout for that.

The other question is, again, very similar. When will we get the next data elements? It's again, within the next few weeks as we continue to develop our technical assistance materials and update them for you. There was a question on when the first fiscal or budget reports are due.

Again, financial reports are due quarterly. So very similar to when your performance reports are due, but that is do – you do submit those in a different way, and we do refer you to your federal project officer to determine what system you need to submit your financial reports as well as what other related documents and information is required.

The other question is, can a state have more than one level 1 account for the WIP System? And so the response to this is, again, we do only issue the level 1 access account to the grant authorized representative. We do – Mary's mentioning that I'm cutting in and out. Is this a little bit better? Okay.

So states access to WIPS. We do recognize that grantees partner with your state workforce system for the purposes of reporting. And I do want to – we love that. We love – we certainly encouraged those levels of partnerships, but again the authorized representative can only be issued that level 1 access account.

We do defer to the grantees policies and procedures as to how that information is shared. Again, that's something that your federal project officer should also be sort of aware of or have access to those policies and procedures. But certainly there's – we'll certainly provide additional guidance about that if folks need to see it in writing.

There is a question here that's getting us a little bit stumped and I'm sure that I'm hoping Greg might be able to answer. The question is, if we presently have two H-1B grants, will there be a separate login for WIPS for each of the grants?

MR. SCHEIB: No, I think when you just have one WIPS account and it has access to both, you'll have – you'll just put what you put the grant number in for one WIPS upload if you're talking about the QPR or you'll put one in for the – you'll put the different grant number in for the other grant you've got.

MS. CADWALLADER: So if the authorized representative is the same for those two [inaudible] –

MR. SCHEIB: Ayreen, you're still with us?

MS. CADWALLADER: Yep. I'm still there. Can you hear me?

MR. SCHEIB: You're just cutting out a lot.

MS. CADWALLADER: How does this sound?

MR. SCHEIB: Better. So what was – the question was, if you – you just – you only need one account, you'll specify what grant you are submitting for or certifying for. But for example, you're going to submit a separate quarterly performance report and you'll also be having to submit a separate CSB file for each grant so it should be pretty self-evident when you get into the system.

Certainly once we get to the point of submitting quarterly performance reports, we can address any of those issues as they come. Who do I request a level 2 upload account from? You submit a request from your authorized rep, your authorized rep sends an email to either Rural Healthcare or the One Workforce grant and then we will issue it to you. But again, if you've already gotten one level 2 account, we're not going to issue a separate one. We're only going to issue one of each. You guys can sort out how you're going to use that account. So let's see. Do we have any more questions, Kristen?

MS. MILSTEAD: I don't think so. It looks [inaudible]. That's it for now.

MR. SCHEIB: All right. Well maybe we should go ahead and move on. I think we are actually passing it over to you at this point, is that right?

MS. MILSTEAD: I think so. I think we're ready to move to a new section and if we have more questions, we can answer them as we go along or in the next break. Thank you all for those great questions and thank you, Greg. We're going to take a look forward now to your participant data and what you should be doing now to prepare to reporting that data in WIPS for the first time for the quarter ending September 30th, 2021.

So starting with that quarter ending September 30th, grantees must submit both their quarterly performance reports and their quarterly narrative reports through WIPS. Grantees should collect information on all part of the grant. These data should include social security numbers. So please ensure that you follow your institution's PII or Personally Identifiable Information protocol.

Before we finish this section, we will provide a general overview of what you should be capturing from participants and DOLs policy on social security numbers. Please remember that your data files should include cumulative data for all participants [inaudible] since the start of the grant so since February. So even though you'll not be submitting that data file until September 30th.

You'll also continue to submit your quarterly narrative report in WIPS using the entry fields for each section of your QNR that Greg just went over. One more thing that we'll just touch on and Greg mentioned this as well is, if you do start serving participants before then, you'll want to go ahead and report on those outcomes that anybody has achieved, including the number of participants that you're serving and any other outcome which we'll talk about shortly in your QNR section 11c which is the additional information section.

So that's where you would tell us about that information before you start reporting [inaudible] data. So I'm going to share some information about the H-1B real-time measures and the difference between those and the WIOA indicators of performance. This will help you as you start to collect and track information on your participants. And also Rural Healthcare grantees are currently or will soon be revising performance outcome or providing milestones, if necessary, as part of your conditions of award.

A thorough understanding of the performance measures may help you as you provide the required revisions and information. All H-1B grantees report on two types of performance methods. The H-1B real-time outcome measures that are used by DSI to assess performance and provide technical assistance and the WIOA primary indicators of performance.

The H-1B real-time measures provide us with that opportunity to evaluate the ongoing progress of your grants. You provided targets for these measures, and again, you may be revising one or more of them in your compliance reviews, and you're being held accountable for meeting these measures.

We use this data to evaluate your progress against those targets you set, and we'll provide you with the technical assistance that you might need to help you meet your goals. Because you capture and report data on your grant participants for these outcome measures each quarter, the information provides that ongoing snapshot of the progress of your grant while you are implementing your program.

The WIOA measures are a set of common outcomes tracked for numerous ETA grants, and they allow it to better align with other ETA program. You did not set targets for most of these outcomes, but you did set targets for two of them. The employment rate for the second quarter after exit and the employment rate for the fourth quarter after exit. It's important to note that you will not need to report on two of these measures in the QPR.

Yeah, sorry. Those are going to be calculated several quarters after participant has exited the program on your behalf by DOL. So these are the six WIOA primary indicators of performance that ETA tracks that then are aligned with all the H-1B grants and all the other ETA grants. So those six measures are the employment rate, the second quarter after exit, the employment rate, and the fourth quarter after exit, median earnings, the second quarter after exit, the credential attainment rate, the measurable skills gain, and the effectiveness in serving quarters as measured by retention of your participants with the same employer in the second and fourth quarter after exit.

So two of the measures are tracked using participant data that you provide in the data file each quarter. And those are the ones highlighted in pink, credential attainment rate and measurable skills gain. And the other four are not. We track those outcomes through UI wage data on your behalf.

And then, however, we just mentioned of the four that are not, you provided targets for to those, so that then those are the first two, the employment rates, second quarter after exit and the employment rate fourth quarter after exit.

And these are the real-time performance measures for both Rural Healthcare and One Workforce. So, and again, you provided targets for these and you will be providing data for each quarter that will then feed into how they're aggregated and we can see your progress on each quarter. And these are the total participants served, the total participants enrolled in education and training, the total participants who complete education and training, the total participants who complete education and training and receive a degree or other types of credential, the total number of unemployed and underemployed participant to complete education and training and then obtain employment, and the total number of incumbent worker participants who complete training and advance into a new position.

And here's a tip; it's important for all grantee members, including your partners, to not only understand the performance measures, but also know your targets for your goals. When the grant team members understand the performance measures, it may help that process for establishing the procedures for how and when that data can get collected efficiently and make that process more seamless.

This is a visual representation of service and training related real-time performance measures and their definition. First, let's talk about the difference between participants served and total participants enrolled and sharing training activities. Participants served is the total number of all participants served.

The total participants enrolled in training activity in the funding opportunity announcement is the total number of unique participants enrolled in education and training activity. You should report an individual as a participant after you have determined that an individual is eligible for the program and they have received a grant-funded service.

However, you should only include a participant [inaudible] participant's role is education and training activity, when they start an allowable training program. This might include on the job training, customized training, incumbent worker training, a registered apprenticeship program, an industry recognized apprenticeship program, paid work experience on internship, classroom for online training strategies, or other activities it describes in your statement of work.

If you have questions about whether you should count an activity, please ask us. Now, let's turn our attention to some of the employment outcome measures. There are two different employment outcomes which are dependent on the participant employment status of entry. The total number of unemployed and underemployed participants who complete education or training activities and obtain employment captures the number of participants whose employment status at program entry is either unemployed or underemployed to complete all of the intended grant-funded training provided to the individual during the grant period of performance and enter employment

The second outcome measure is the total number of incumbent worker participants who complete training activity and that advanced into a new position. Then this outcome measure refers to the participant whose employment says at program entry is an incumbent worker to complete all the intended grant-funded training provided to that individual during the grant period of performance and advances to a new position with their current employer or with a new employer.

So here's the thing about you incumbent workers. For a participant to be considered an incumbent worker, the grantee must have a partnership agreement with the employer of that participant to provide the incumbent worker training prior to that participant entry into the grant program. So only participants who meet this definition are going to be considered incumbent workers.

And then where this program is concerned, only incumbent workers who's in complete training activities and advance into a new position are going to count. Incumbent workers typically have a new job title and a description when they advance into a new position. However, as long as new competencies are used in the job position after program completion, and the change can be documented, the incumbent worker can be counted as having advanced into a new position.

Even if a new title is not conferred on the incumbent worker, the advancement can be counted in the second or third quarter after completion. Let's quickly review who is a participant. As I mentioned earlier, a participant is any individual who receives a grant-funded service, excuse me, after they are determined eligible to be served by the program.

Commonly at this stage, the types of services might include case management services, skills assessment to determine an individual's strengths and challenges or drug-testing prior to an individual being hired by an employer. Participant does not include someone who only received some basic outreach materials or an orientation to the program, although staff time may be charged to the grant for these outreach activities.

So time for another knowledge check; what are the real-time measures? So these are outcome measures for which you provide target outcome numbers in your statement of work, outcome measures ETA will use to track your grants quarterly performance and identify TA opportunities, exit based outcome, options one and two above.

It looks like most of you have chosen the fourth one, option two above and that is correct. Very good. So there – the real-time measures are those which you provided targets and which you yourself will be reporting on quarterly so that we can provide you with technical assistance on an ongoing basis.

So it looks like we have a lot of questions so we're going to start right here and [inaudible] some more if we get any of those. Let's take a look. We have a question. Are there [inaudible] if performance measures are not met one quarter? Ayreen, do you want to take that one? [Inaudible]. is Ayreen available?

MR. SCHEIB: Sure I can take that. Well, I've tried to answer it in the chat, but I'll try to answer it here. So I'm not sure what he means by claw backs, but I think the point is, is that if you need to make a change to a – well, no, actually I don't know. Claw backs, you must – you might – actually, you're probably talking about fiscal stuff. Maybe we could – maybe you could clarify that. And who wrote that question?

Yeah. Cheney (sp). Yes. Fiscal claw backs. I mean, there's always the threat you're not going to get another ETA grant if you don't meet your performance outcomes, you're always under that threat, so but no, not during the generally, unless there was something – I mean, it's not like there's a policy on that. Certainly, if we saw grantee who was struggling, we'd be working with you to try and resolve what the issue is and go from there.

MS. MILSTEAD: Okay. Thank you, Greg. I'm sorry, go ahead [inaudible] going to say.

MR. SCHEIB: No. Should we move on to the next one? On the employment satisfaction measurement, is there really an expectation that interns will be retained second and fourth quarter? I did answer that or tried to answer that in the chat. First of all, that measure doesn't actually measure interns if you're talking about internships or work experience, that's a measurement of folks who are – employer satisfaction with folks who are – with folks who are all I think been employed second or fourth quarter after exit.

But on the upside with that, you don't actually have to submit anything to track that measure. We track that measure on your behalf using the – what we call the CRIS system which takes UIOH (ph) data from across the country and establishes what the outcome is for that. You also didn't set targets for that so you're not really being held accountable for that measure.

(END)