INITIAL REPORTING FOR YOUTH APPRENTICESHIP READINESS GRANTS (YARG)

Performance Reporting through WIPS

For the first quarterly report due November 14, 2020, YARG grantees will be expected to submit the Quarterly Narrative Report (QNR) and Financial Report (ETA-9130), more regarding those reports are available here: https://youthasready.workforcegps.org/resources/2020/08/18/13/08/Youth-As-Ready-Grant-Performance-Page. Starting with the second quarter of performance, YARG grantees will also begin reporting individual participant record data into the Workforce Integrated Performance System, or WIPS. This tip sheet is to help you prepare for the upcoming months by providing you information necessary to complete your participant data tracking systems prior to the training regarding the WIPS reporting process.

Your internal record-keeping system should be developed using the Participant Individual Record Layout (PIRL) data elements indicated with a letter ‘R’ under the Apprenticeship column in the PY 2020 PIRL, available here: https://www.dol.gov/agencies/eta/performance/reporting. There are additional definitions for these data elements in a document called ‘WIPS Valid Values’, and are also relational rules for developers between data elements which can be found in a document called “WIPS Logical Rules”: both of which are available here: https://www.dol.gov/agencies/eta/performance/wips.

It’s important to note that WIPS is only a data receptacle for reporting purposes: grantees upload the data required by the PIRL, and a Quarterly Performance Report (QPR) is generated by WIPS. WIPS is NOT an integrated case-management system or participant data tracking system and the development of such a system is the responsibility of the grantee to procure/develop/build/utilize in order to ensure accurate data reporting.

There are a number of commercially available grant performance tracking data systems on the market. For other ETA grant programs, some grantees purchase proprietary systems, some grantees build their own system, and some modify systems they already have in place for other grants – the choice is up to the grantee. Whatever path your organization chooses to follow, it’s important that your system has flexibility to accommodate and adapt to potential changes to WIPS required by regulatory changes,
policy changes, or even to correct data anomalies/errors. Think of reporting as an evolving system, striving to get better with each new update.

The Apprenticeship system for WIPS is still in the test phase as we discussed on the orientation webinars so far, and barring any unforeseen circumstances, training will begin in December for the first data upload in February. For the first quarters the system is in use, grantees should make every effort possible to upload their reports 7-10 days early to allow sufficient time to troubleshoot any resultant errors before the due date.

Establishing Your Processes for Performance Reporting

ETA wants to ensure your data collection efforts are as seamless and accurate as possible with minimal burden. Ultimately reporting should reflect the great work and impact your program is having on the workforce. To accurately and effectively track participants, there are a few things grantees must do:

- Determine participant eligibility
- Collect participant data
- Track participant data
- Update participant data as needed

Determining Participant Eligibility

Before collecting participant data on an individual, first establish whether an individual is eligible for your YARG grant program and activities. As a reminder, participant eligibility for YARG, as defined in the FOA, is any youth (either in-school or out-of-school) between the ages of 16 through 24 at time of program participation. In addition, there is a Veteran’s priority outline in the FOA. Beyond that, there is no additional participant eligibility for YARG participants defined in the FOA. As part of your process to determine participant eligibility, some sample questions might include:
- Is the individual eligible based on the grant’s funding vehicle (FOA-ETA-20-06)?
- Is the individual eligible based on the grant Statement of Work (SOW) that was submitted to DOL?
- Is the participant a suitable candidate for the level of training that is offered by this program?
- Are there any prerequisite education/skills needed to be eligible for the training offered?

Gathering the information needed to inform the data elements should be an integral part of your participant on-boarding process (including assessment, intake, and orientation).
Tracking this information in an electronic format will allow grantees, employer partners, training providers, and other stakeholders the ability to track outcomes in a systematic way that will ensure consistency and accuracy.

**Collecting and Tracking Participant Data**

In preparation for quarterly performance reporting, grantees should develop an internal record-keeping system or use existing resources to track all participants receiving YARG grant-funded services. Examples of acceptable tracking systems include, but are not limited to, the existing State WIOA performance management system, an Access database, or an Excel spreadsheet. The only requirement is that the system capture all data necessary to report and that the system can easily be modified to incorporate data elements once the performance reporting package has been approved by OMB. The system must be able to save or export participant records as one .CSV data file.

Here are some tips to help improve the data collection process between program grantees, employer partners, and education and training providers:

- Develop an electronic case management system that can be transferable between appropriate program partners in order to better assist the development and submission of quarterly reports to DOL.

- Ensure all data elements are reviewed and definitions are understood by all partners before deciding how to answer the data element code values for a participant.

- Ensure that all relevant program partners and training participants understand why certain information is collected, where it is sent and for what purpose.
  - For example, often training participants are handed a paper form to fill out basic details, which is handed back to the training provider with minimal face-to-face interaction. Unless there is an intermediary, like a case manager, the need for this information may not fully explain or understood.

- Add disclaimer language and guidance during the enrollment process so participants will understand why certain information is being collected on them.

- Add relevant dates to your participant enrollment/intake form

**Collecting Personally Identifiable Information (PII)**

The Office of Management and Budget (OMB) defines PII as information that can be used to distinguish or trace an individual’s identity, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual. Grantees are required to protect PII at all times including during collection, storage, transmission and disposal. Grantees may possess large quantities of PII for all program participants. This information is generally found in personnel files, participant data sets, performance reports, program evaluations, grant and contract files, and other sources.
All YARG grantees are asked to collect Social Security Numbers (SSNs) for all participants served with Grant funds and report outcomes to ETA. Grantees have reported that employer partners and training providers were sensitive to the collection of PII, including SSNs and race/ethnicity information. Participant intake forms should include sample disclaimer language around the collection of Social Security Numbers (SSNs) as indicated on the next page. Refer to TEGL 39-11 for more information.

ETA, on behalf of the grantees, will work with its State partners to match SSNs with employment data available from State Unemployment Insurance (UI) and other administrative wage records (e.g., Federal and Military employment). This matching procedure is necessary in order for ETA to collect consistent and reliable aggregate outcome information for each grantee by calculating a set of Common Performance Measures that includes entry into employment, employment retention, and six-month average earnings.

**TIPS to help protect PII**

- Before collecting PII, have participants sign release forms acknowledging the use of PII for grant purposes only.
- Whenever possible, ETA recommends the use of unique identifiers for participant tracking instead of SSNs. While SSNs may be initially required for performance tracking purposes, a unique identifier could be linked to each individual record. Once the SSN is entered for performance tracking, the unique identifier would be used in place of the SSN for tracking purposes. If SSNs are to be used for tracking purposes, they must be stored or displayed in a way that is not attributable to a particular individual, such as using a truncated SSN.
- Ensure the collection method is sophisticated enough to securely store participant information including PII.
- Use appropriate methods for destroying sensitive PII in paper files (i.e., shredding) and separately deleting sensitive electronic PII.
- Do not leave records containing PII open and unattended.
- Store documents containing PII in locked cabinets when not in use.
- **NEVER** send your participant records or data files with sensitive PII through e-mail, nor to DOL Staff.
- Immediately report any breach or suspected breach of PII to the FPO responsible for the grant, and to ETA Information Security at and follow any instructions received from officials of the Department of Labor.

**Disclaimer Language on the Collection of Personally Identifiable Information (PII):**

Grantees may use the following sample text to inform participants how PII is being protected and why SSNs:

*This project was funded by a grant awarded by the U.S. Department of Labor’s Employment and Training Administration. The collection of this information helps to track the long-term success of this training program. Your personal information is kept confidential and secure and will not be shared with any outside agencies other than those involved with the support or oversight of the grant received by <<enter recipient organization name>> and issued by the U.S. Department of Labor. Your information will never be sold or shared with third party agencies through your participation in grant supported training activities. Please direct any additional...*
questions concerning the use of your personal information to << enter prime recipient program contact information, ie Jane Green, Program Director at 856-691-XXXX>>.

In addition to requesting a range of information from project participants, including demographic information, the use of your Social Security Number is also requested in order to access wage and employment information through state databases. Although you cannot be denied service for failure to provide your Social Security Number, we strongly encourage you to do so in order to enable the project to quantify specific employment-related outcomes. Your personal information will be kept confidential.