RE: Apprenticeship State Expansion (ASE) Grants

Dear Apprenticeship State Expansion (ASE) Grantee Authorized Representatives:

This letter serves to address concerns raised by States on the definition of a participant for the ASE grant program. Our intent is to provide clarification of the term “participant” (as defined in Training and Employment Guidance Letter (TEGL) 17-18) and “grant-funded service”, as well as what constitutes a participant for purposes of performance reporting and meeting performance goals of ASE grants. A formal change (change 3) to TEGL 17-18 is forthcoming, but in the interim, this letter serves as formal notification of updated policy and is effective immediately. This guidance applies to the ASE grants only.

**Background:**

The term “participant” varies across programs, but is generally understood within the Department of Labor’s (DOL) Employment and Training Administration (ETA) programs to be an individual who is the direct recipient of a grant-funded service. TEGL 17-18 incorporated terms aligning with definitions of other ETA grant programs to support consistent performance reporting across the DOL.

ASE grants are required to report in ETA’s Workforce Integrated Performance System (WIPS), and report participant level data in alignment with the approved Participant Individual Record Layout (PIRL), for which ETA has received OMB-approval (OMB No. 1205-0521) for those data elements that comprise the Office of Apprenticeship’s subset of the PIRL.

ETA will update existing performance reporting guidance, as necessary, to align with this letter and forthcoming TEGL change.
**Clarification and Updated Guidance:**

Included below is updated guidance on the definition of “participant” and “grant-funded service,” reporting other individuals impacted by ASE grants, reporting participant outcomes to ETA, and meeting TEGL minimum participant served goals:

- **Definition of a Participant (Clarification)**
  A participant is an individual who receives a grant-funded service after a determination of eligibility, and for whom the grantee will collect all relevant data* for each individual for performance reporting purposes:
  1. ASE eligibility requirements:
     - Individuals must be 16-years of age or older;
     - Newly enrolled during the ASE grant performance period in a registered apprenticeship program after July 1, 2019; and
     - The direct recipient of a grant-funded service (see definition below).

  NOTE for ASE Grants: Pre-apprentices may be reported in the Quarterly Performance Report (QPR) as a participant served if they meet the definition of participant, but do not count towards the performance target as outlined in TEGL-17-18.

  *Relevant data: Grantees are required to collect, track, and report on relevant participant-level data, including Social Security Number, for all participants that receive grant-funded services after a determination of eligibility. This includes any necessary data points required on the Quarterly Performance Report (QPR) for interim purposes, and the relevant PIRL data elements as outlined in forthcoming Workforce Integrated Performance System (WIPS) roll-out guidance.

- **Definition of a Grant-Funded Service: (Updated)**
  Grant-funded services are allowable services applicable to the grantee’s SOW and identified in TEGL 17-18. These grant-funded services trigger participation:
  1. Must be: 1) an allowable cost for a participant activity; 2) a cost that is allocable; 3) a service that is of benefit to the participant; 4) a service which they would not have received without benefit of the grant; and, 5) adequately documented (both the expenditure and recipient receipt of service).
  2. For the purposes of the ASE grants, the TEGL identifies the following grant-funded services: On-the Job-Training (OJT), on-the Job-Learning (OJL), Related Technical Instruction (RTI), and supportive services. To be considered a participant individuals must receive one of the grant funded services.
NOTE: Although employer outreach, participant outreach and recruitment activities, program development costs, and eligibility determination are allowable uses of grant funds, they do not qualify as a grant funded service and do not trigger participation (does not meet the definition of a participant).

- **Other Individuals Impacted by the Grant (New)**
  In addition to reporting participants served in the QPR, ASE grantees may also report on “other individuals impacted” in the Quarterly Narrative Report (QNR)” in Section XI “Additional Information”, which asks for additional outcomes not reflected on the QPR.

“Other individuals impacted” includes individuals who receive benefit from the grant, but who do not receive grant funded services that qualify them as participants. Within this category, grantees may report on (1) individuals who enroll in a program developed with grant funds (and not a participant as defined above), and (2) other grant impacts.

1. **Registered Apprentice individuals reported as “Other Individuals Impacted”**
   Grantees may report as “other individuals impacted by the grant” individuals who enroll in a registered apprenticeship program developed with grant funds.

Grantees **may** use results reported for both Registered Apprentice participants served by direct funded services reported in WIPS and Registered Apprentices individuals who are reported as “Other Individuals Impacted” (reflected in 1.Number of Registered Apprentices in the table below) to meet minimum participants served goals identified in TEGL 17-18.

Included below is a suggested template for reporting “Other Individuals Impacted” information in ASE QNR in Section XI, “Additional Information”:

<table>
<thead>
<tr>
<th><strong>Other Individuals Impacted by the Grant</strong></th>
<th><strong>Total Current Quarter</strong></th>
<th><strong>Cumulative Total</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Number of Registered Apprentices</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Individuals who enroll in a RA program developed with grant funds that are not participants as defined above and not reported in WIPS</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

“Other individuals impacted” should not be reported on, nor duplicative of, the QPR data reported through WIPS or on the interim QPR. Grantees must have documented expenditures to support data reported for these individuals.
2. Other Grant Impacts
Grantees may report on other grant efforts that support enrollment of Registered Apprentices. Grantees should identify Registered Apprenticeship activity types resulting in the number of other individuals impacted by the grant, as reported above. The types of activities that may be included are (but are not limited to): recruitment events; outreach; workforce system integration activities; and data integration activities.

- Meeting Minimum Participant Served Goals and Reporting Performance Outcomes (Updated)
Grantees may use results reported for both Registered Apprentice participants served by direct funded services reported in WIPS and Registered Apprentices individuals who are reported as “Other Individuals Impacted” (reflected in 1. Number of Registered Apprentices in the table above) to meet minimum participants served goals identified in TEGL 17-18. Collectively, the totals will count towards the required minimum participant served goal. Therefore, grantees must ensure data is clearly and accurately reported on these outcomes in both the QPR/WIPS and the QNR.

Grantees may not use results reported for 2. Other Grant Impacts to meet minimum participants served goals identified in TEGL 17-18.

Should you have any questions regarding the above, please contact your FPO.

Sincerely,

Melissa Abdullah
Grant Officer