

U.S. Department of Labor

Employment and Training Administration
Office of Apprenticeship



Performance Reporting Technical Assistance Aid

TOPIC: APPLYING THE CONCEPT OF “EXIT” TO APPRENTICESHIP GRANTS

BACKGROUND

“Exit” is a performance- and reporting-related term initially utilized under WIA (the Workforce Investment Act), the Workforce Innovation and Opportunity Act’s (WIOA) predecessor. Exit occurs when a workforce system participant has not received any services for 90 days and no future services are scheduled. At that point, the “exit date” is applied retroactively to the last date of service. However, it is incorrect to simply state that the “exit date” is the last date of service because 90 days of “no service” must first occur. (You cannot have an exit date without 90 days of no service.) WIOA indicators of performance are generally based on the date of exit, which is why that date is critical.¹

The formal integration of Registered Apprenticeship into workforce programming began under WIA. Training and Employment Guidance Letter (TEGL) 2-07, dated July 12, 2007, clarified that, with respect to Registered Apprenticeship programs (RAPs), “exit” could occur at the point when workforce services were done *even if the individual was still participating in a RAP*. TEGL 2-07 is still considered active guidance under WIOA so that, once WIOA-funded services are done, the individual could be allowed to exit. At that point, the WIOA exit-based indicators of performance would kick in. Here is language from page 13 of TEGL 2-07:

Identifying the Point of Exit. For the purposes of tracking and common measures, WIA and Wagner-Peyser clients associated with apprenticeship programs should be exited from the workforce system after the completion of WIA/Wagner-Peyser associated activities. It is not necessary to track apprentices through to the completion of their apprenticeship program unless they are supported by workforce system resources for the entire duration. Thus, an apprentice who receives workforce system resources to support specific portions of classroom training may be exited from the program upon completion of that training, even if they continue in the apprenticeship program for a longer period of time.

This policy supports the integration of Registered Apprenticeship with workforce system services because it means the workforce system would not have to “hold onto” participants in RAPs. Participants could be exited once WIOA-funded services were done. This directly addressed the workforce system concern that individuals would have to remain WIOA participants as long as they continued in a RAP – in some cases, for several years – requiring the need for costly and time-consuming case management and follow up services. Once WIOA-funded services were done, the individual could exit, allowing the exit-based indicators of performance to kick in.

“EXIT” AND APPRENTICESHIP GRANTS

There has been some confusion regarding the interpretation of “exit” when applied to individuals participating in Apprenticeship Grants because WIOA indicators of performance are now required for

¹ The only WIOA required performance measure not based on exit is the *Measurable Skill Gains*, which is an interim progress measure. The employment-related indicators, including the *Median Earnings* measure, and the *Credential Attainment Rate* are based on the date of exit.

Apprenticeship Grants and most of the indicators are based on exit. However, “exit” from an apprenticeship grant should be treated differently from “exit” as it pertains to WIOA/workforce system participation. Under Apprenticeship Grants, exit should not occur until the individual has either completed the RAP or withdrawn from the RAP and is no longer receiving Apprenticeship grant services. Given the period of performance of apprenticeship-related grants and the long-term nature of many RAPs, *many participants in Apprenticeship Grants will not exit* prior to the end of the Apprenticeship grant because their participation in a RAP will extend beyond the grant period of performance. These grant participants *will not be included in the WIOA performance indicators.* Depending on the length of the RAP, grant participants may or may not complete the program within the grant period of performance. If the individual completes the RAP, they can be exited and the WIOA performance indicators can then be applied.

Question: For Apprenticeship Grants, should we equate “exit” with RAP completion, which likely will not occur during the grant period of performance?

Answer: Yes, but with an important caveat. Specifically, individuals may complete their RAP participation during the grant period of performance, in which case, they would exit from the grant at the time of RAP completion. However, individuals may also withdraw or drop out of the RAP and stop receiving Apprenticeship grant-funded services during the period of performance; they would *also* exit from the grant.

Question: Most of the occupations we are targeting under our apprenticeship grant represent longer-term RAPs – e.g., in excess of three years. Therefore, many of our grant participants will not have time to complete their RAP. Does this mean we will not be held accountable for the WIOA indicators of performance?

Answer: The grantee will only be held accountable for the WIOA indicators based on exiters, i.e., those individuals who either complete their RAP or withdraw from their RAP. Those who are still participating in a RAP at the time the grant period ends will not be considered exiters. They will not be included in WIOA indicators.

Some Examples:

1. An individual enrolls in a newly registered 4,000 hour (two year) apprenticeship program where their related instruction component is financed by apprenticeship grant funds. The individual completes the RAP within the grant period of performance; the exit date would be the date of program completion. At that point, participant data would become part of the pool for the WIOA exit-based performance indicators for that grant. (There would be a PIRL (*Participant Individual Record Layout*) record for this individual because they received direct, grant-funded services; the individual would be reported on the grant’s Quarterly Performance Report (QPR)).
2. A RAP is developed as a result of grant-related efforts and interventions. This information is reported on the grantee’s Quarterly Narrative Report (QNR) under “# of new programs created”². Many individuals enroll into the RAP. The grantee can document that 35 individuals are now registered

² “Other Individuals Impacted” may not be applicable for all Apprenticeship Grants. Grantees should refer to the funding vehicle (i.e., TEG or FOA) that governs their grant.

apprentices in the program. None of these individuals receive a direct, grant-funded service. Therefore, none of these individuals become grant participants. Because they never become grant participants and are considered reportable individuals, the exit date is irrelevant. Consequently, they will not be included in WIOA performance indicators. There are only four required “reportable individual” PIRL data elements for these individuals, but they will not be reflected in the grant’s QPR.³ However, they are considered “reportable individuals” and should be reported in the grantee’s QNR under “# of individuals impacted by the grant.”

3. An individual enrolls in a newly registered 6,000 hour (three year) apprenticeship program where Apprenticeship Grant funds are supporting the related instruction component. The individual is co-enrolled into a WIOA Adult program, which supports the OJL/OJT component for six months, which is consistent with the local policy. WIOA funds also provide for initial supportive service needs. Due to grant start-up timeframes, the individual will not complete the RAP within the grant period of performance. Because the individual received a direct, grant-funded service, they are a grant participant that will be reported on the QPR (i.e., PIRL data will be collected). However, the individual would not “exit” the Apprenticeship Grant during the grant period of performance. Therefore, they will not be subject to WIOA performance indicators that are part of the Apprenticeship Grant. From a *WIOA perspective*, the apprentice would be exited after WIOA-funded services are done (i.e., initial supportive services and six months of OJL/OJT wage-related reimbursement). Unless additional WIOA-funded services are provided, WIOA performance indicators would begin calculating based on the date of exit for the WIOA Adult program.

³ Four data elements for reportable individuals: PIRL 100 (Unique Identifier); PIRL 1007 (Date of Most Recent Reportable Individual Contact); PIRL 2914 (Apprenticeship Grant Program Status); PIRL 2920 (Apprenticeship Grant Number).