Apprenticeship State Expansion (ASE) Grants

INTERIM REPORTING ONLY
PERFORMANCE REPORTING REFERENCE GUIDE

October 2019

**Interim Reporting:** For reporting during the time period between the grant period of performance start, July 1, 2019, until such time that the performance reporting package is OMB approved and subsequent reporting system implemented.
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V3 repaired:
- the suggested QPR date submitted cell
- the suggested QNR entry formatting issues and POC e-mail entry
Introduction

This guide applies to the Interim Reporting Period, which is the time period between the grant period of performance start, July 1, 2019, until such time that the performance reporting package is OMB approved and the subsequent reporting system developed and implemented. Once the performance reporting package is OMB-approved, ASE grantees will report grant activity and progress through the Workforce Integrated Performance System (WIPS). The WIPS implementation is anticipated to go into beta-testing, where a few grantees will be asked to ‘test-report’, by the third quarter of Fiscal Year 2020. Full implementation will depend in large part on the success rate of the beta-test period.

Note that grantees must collect participant-level data records during the interim period, but these records will not be submitted to DOL until the secure process to do so via WIPS is available.

ASE Grant Recipients must report quantitative and qualitative grant-specific performance data on a quarterly basis throughout the life of the grant as indicated within the grant agreement. Additionally, grant recipients will submit an annual narrative report on Apprenticeship activity on a Statewide basis for the year ending June 30.

In this document, we provide an overview of reporting requirements including reporting dates, the INTERIM Quarterly Performance Reports (QPRs), the INTERIM Quarterly Narrative Reports (QNRs), Financial Reporting, as well as provide some information regarding general grants-management practices and participant-level data.

Reporting Dates

<table>
<thead>
<tr>
<th>Report Activities Occurring Between</th>
<th>Quarter End Date</th>
<th>Progress Report Due Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>January 1 – March 31</td>
<td>March 31</td>
<td>May 15</td>
</tr>
<tr>
<td>April 1 – June 30</td>
<td>June 30</td>
<td>August 14</td>
</tr>
<tr>
<td>July 1 – September 30</td>
<td>September 30</td>
<td>November 14</td>
</tr>
<tr>
<td>October 1 – December 31</td>
<td>December 31</td>
<td>February 14</td>
</tr>
</tbody>
</table>

Quarterly Reports are due to DOL-ETA no later than 45 days after the end of each reporting quarter. The above table provides the due dates for each reporting quarter throughout the period of performance. Reports not submitted by the due date will be considered late and not in compliance with grant requirements. Before you can start the reporting process you will need to:

- Access your participant-level data tracking system
- Get access to the [ETA’s Financial Reporting System](#) for filing the quarterly ETA 9130 Financial Reports
- Find and review the Performance Reports section of your grant agreement
- Review [TEGL 14-18](#) for general performance reporting guidance
Establishing Your Process 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 ASE grant program and activities. 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 (TEGL-17-18)?
- 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 ASE grant-funded services. Examples of acceptable tracking systems include 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)**

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. 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.

All ASE 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.

**HOT 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 DOL or DOL staff your participant records or data files with sensitive PII.
- 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...
are being collected:

*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.

ASE Reports

The grant agreement requires all ASE recipients to submit Quarterly Narrative Reports (QNR), Quarterly Performance Reports (QPR) and ETA-9130 financial reports. Grantees can begin to familiarize themselves with the necessary reporting resources, available on the WorkforceGPS website at: https://performancereporting.workforcegps.org/. The final requirements for ASE grant reporting will be transmitted after OMB approval of the performance reporting package currently in clearance.

Before discussing reporting, grantees must first know what they are reporting which is ultimately the progress towards achieving the participant outcomes target indicated in the TEGL.

**Participant**

For the purposes of this grant, please include in the report all individuals that fulfill the following criteria:

An ASE program participant is an individual:

1. who has satisfied all applicable programmatic requirements for the provision of services, including an eligibility determination and intake process.

2. AND became a Registered Apprentice after July 1, 2019 who was not previously enrolled as a Registered Apprentice within the same industry

3. AND is participating in a Registered Apprenticeship Program as a Registered Apprentice

4. AND who has received a training (OJL/RTI) or supportive service funded with ASE funds.
Report requirements during the interim period until OMB approval of performance data and subsequent WIPS implementation:

<table>
<thead>
<tr>
<th>Description</th>
<th>Format</th>
<th>Purpose</th>
<th>Interim Method of Submission</th>
</tr>
</thead>
<tbody>
<tr>
<td>QNR: Narrative Report</td>
<td>suggested interactive Word template or another similar format which includes all the required information</td>
<td>Details activities and successes which occurred over the quarter</td>
<td>submitted via e-mail for the duration of the period of performance</td>
</tr>
<tr>
<td>QPR: Aggregate report of participant activity</td>
<td>suggested interactive Excel template or another similar format which includes all the required information</td>
<td>To review and assess grantee performance</td>
<td>submitted via e-mail for the interim period only</td>
</tr>
<tr>
<td>ETA-9130: Financial Report</td>
<td>electronically through the EBSS system available to the financial contact only</td>
<td>To review and assess grantee financial performance</td>
<td>The ETA financial reporting system via the OGM website at <a href="https://www.doleta.gov/grants/financial_reporting.cfm">https://www.doleta.gov/grants/financial_reporting.cfm</a></td>
</tr>
</tbody>
</table>

**NOTE:** participant-level data will not be submitted during the interim period

### Quarterly Narrative Reports

The Quarterly Narrative Report (QNR) is a written report that reflects grant program activities and complements the quantitative data reported on the QPR. Grantees can also report information that is not reflected on the QPR, and identify technical assistance needs and/or grant program highlights from the latest reporting quarter. Grantees are required to submit the content indicated in the suggested format Word document.

Grantees must submit the Quarterly Narrative Report via e-mail to: your FPO and Apprenticeship.grants@dol.gov within 45 days following the end of the previous calendar quarter for the duration of the period of performance.

### Interim QNR Instructions

ETA has provided a suggested QNR template in Word.docx that grantees may choose to use or they may submit their own report, provided it fulfills the QNR reporting requirements. In the suggested Word QNR Template, please first <save as> and name the file with the first seven digits of the grant number and the end date of the reporting period, i.e. AP-#### 2019.9.30. Then, fill out the date information at the top by clicking where text says “click or tap to enter a date”. Next, fill out the contact information in Section 1 by clicking within the cell or the highlighted field and entering the information. Then, continue on to the report body and respond to each category by clicking on the field which says “click or tap here to enter text”. Note that these fields are ASCII Text only, and not HTML or dynamic text. If your report requires some kind of graphic to illustrate the narrative portion, it will have to be submitted as an attachment within the submission e-mail. Should you choose to not utilize the suggested template, please provide all the requested information in another format.
Quarterly Performance Reports

The QPR is a snapshot of the grant’s participants, services, and outcomes. ETA’s National and Regional Offices use information on the QPR to assess whether grantees are serving participants and expending funds as described in the grant applications and grant award agreements. Information from the QPR also helps ETA assess progress toward grant goals and to identify technical assistance needs. QPRs are due within 45 days after the end of each calendar quarter.

DOL anticipates the many grantees are engaged in startup activities and do not yet have participants to report. Nevertheless, all grants must submit a QPR. If no participants have been served in the first quarter, grantees should submit a QPR with zeros in all the fields.

During the interim reporting process period only, the ASE QPR must be submitted along with the QNR via email to your FPO and copy apprenticeship.grants@dol.gov no later than 45 days after the end of the reporting period.

- **NOTE:** during the interim reporting period, grantees must still collect participant-level data for each Registered Apprentice they want to report as a participant including SSN, apprentice id and demographic information, however, that data **WILL NOT BE** submitted to DOL until the WIPS implementation is complete to assure the secure transmission of the files.

Interim QPR Instructions

ETA has provided a suggested QNR template in Excel.xlsx that grantees may choose to use. In the suggested Excel QPR Template, there are six tabs across the bottom of the spreadsheet, each one indicating the end date for the first six quarters of this grant’s period of performance. DOL expects OMB approval at some point during this six quarter timeframe but built included additional quarters as a ‘buffer’ into the document just in case.

Grantees will input information only into the yellow cells. The grey and green cell data are derived or calculated from the information input to the yellow cells. Please refer to the template for additional reporting instructions.

Please provide information via this report for activities related to for this ASE apprenticeship grant only, other apprenticeship grants (AAI, SAE, etc.) must be reported according to their guidance. In the suggested Excel QPR Template, please first < save as > and name the file with the first seven digits of the grant number and the end date of the reporting period, i.e. AP-#### 2019.9.30. Then, begin by clicking on the corresponding tab at the bottom, and fill out the yellow data entry cells on the sheet. The next reporting period you would utilize the same process but click on the second tab, and so on. The cumulative data will auto-populate based on the input values across quarters. Should you choose to not utilize the suggested template, please provide all the requested information in another format, being sure it aligns mathematically within the quarter and across quarters.

Financial Reports – ETA 9130

All ETA grant recipients are required to report quarterly financial data on the ETA-9130, an OMB approved reporting form. Financial reports can only be submitted by the financial contact with access to the system. These individuals are usually someone already designated in the budget or accounting office for State entities.

There are several different types of 9130 forms which are specific to various grant programs. ASE grants will utilize the **ETA-9130 (BASIC)** financial report. More information on this process is available at the Office of Grants Management (OGM) website at [https://www.doleta.gov/grants/financial_reporting.cfm](https://www.doleta.gov/grants/financial_reporting.cfm)