Attachment 1: H-1B Grants

I. Introduction

This attachment describes the program specific details of the performance accountability system for H-1B job training program grants (H-1B grants). The Department of Labor ("the Department" or "DOL") has made a concerted effort to align the performance accountability systems of its various workforce programs. In particular, the H-1B grants program is statutorily required to report on the employment outcomes attained by workers receiving training under these grants by using indicators of performance that are consistent with other indicators used for employment and training programs. 29 U.S.C. §3224a(7). This attachment therefore describes the alignment of the H-1B program's performance accountability measures with the Workforce Innovation and Opportunity Act (WIOA) indicators, and highlights areas where the H-1B grants program differs from the shared DOL performance guidance described in the main body and appendices of this TEGL. Note that references in this attachment to section numbers of this guidance refer readers to the main body of this Training and Employment Guidance Letter (TEGL).

This attachment provides H-1B performance reporting guidance unique to H-1B grants with periods of performance start dates of July 1, 2016 and later.

As part of the DOL Employment and Training Administration's (ETA) quarterly reporting process, H-1B grants with start dates of July 1, 2016 and later are required to report in accordance with WIOA performance reporting requirements, consistent with this guidance. Although H-1B grants are authorized under the American Competitiveness and Workforce Improvement Act (ACWIA) and not WIOA, all H-1B grants with a start date of July 1, 2016 and later will report in alignment with WIOA performance reporting requirements as described in this guidance. ETA, will also provide additional supplemental guidance that H-1B grantees must follow, including the *H-1B Grants Performance Reporting Handbook & Workforce Integrated Performance System (WIPS) Reporting Guidance, Joint Quarterly Narrative Report Template (ETA-9179)*, Frequently Asked Questions, and other technical assistance resources. These resources can be found on the H-1B performance resources page on WorkforceGPS (https://performancereporting.workforcegps.org/resources/2017/08/08/11/32/H-1B-Performance-Reporting-Resources).

Current H-1B grants that fall under this guidance are H-1B TechHire Partnership Grants (FOA-ETA-16-01), H-1B Strengthening Working Families Initiative (SWFI) (FOA-ETA-16-05), and H-1B America's Promise Job Driven Grants (FOA-ETA-16-12). This guidance also applies to all future H-1B grants awarded after the release of this TEGL.

H-1B grant performance outcome measures will be established using the data collected through the WIOA DOL-only Participant Individual Record Layout (DOL-only PIRL) schema for H-1B, the Amended ETA-9172 DOL Participant Individual Record Layout (PIRL) for H-1B Grants (https://h1bskillstraining.workforcegps.org/resources/2017/06/06/14/32/Amended_ETA-9712_DOL_PIRL_for_H-1B_Grants), for two unique types of performance measures: 1) the

WIOA primary indicators of performance; and 2) H-1B grant specific "real-time" outcome measures.

All H-1B grantees are required, as outlined in their grant's Funding Opportunity Announcement (FOA) and grant award, to report participant level data, for all individuals served using grant funds, in alignment with the WIOA indicators, which are further identified in the DOL-only PIRL. This data is required as part of submitting quarterly progress reports to DOL in order to comply with the reporting and record keeping requirements of the grant. Grantees are required to submit four quarterly progress reports each calendar year. Each grantee must submit a quarterly progress report containing updates on the implementation and progress specified in their grant Statement of Work (SOW). This progress report contains both a Quarterly Performance Report (QPR) form and Quarterly Narrative Report (QNR). The QPR provides aggregated performance data used to determine the levels of participation and program accomplishments for the most recent quarter and cumulative to date. An H-1B program-specific QPR form will be generated from WIPS once participant data is uploaded, validated, and edit checks are complete.

II.   Differences from Shared Guidance

1. Primary Indicators of Performance
H-1B grants report on two types of performance outcome measures: 1) the WIOA primary indicators of performance; and 2) and H-1B specific "real-time" outcome measures. H-1B grantees will use the DOL-only WIOA PIRL data elements (DE), definitions and code values identified specifically for H-1B grants to collect and report on both types of performance outcome measures.

Grantees will use the DEs specified for H-1B grants to collect and report participant level information such as: demographics (including Social Security Numbers (SSNs) and date of birth (DOB)) program start and end dates (including valid training activities and supportive services) and program completion outcomes such as credential attainment and employment placement outcomes. The PIRL DEs grantees collect and report are indicated in the DOL-only PIRL.

Unless otherwise specified in a particular H-1B grant FOA or grant award, grantees will apply the definitions of terms as stated in this guidance. Please refer to the *H-1B Grants Performance Reporting Handbook & Workforce Integrated Performance System (WIPS) Reporting Guidance* (https://h1bskillstraining.workforcegps.org/resources/2017/07/07/12/48/H-1B_Grants_Performance_Reporting_Handbook_-_WIPS_Reporting_Guidance) for additional performance related guidance.

WIOA Primary Indicators of Performance
In compliance with 29 USC § 3224(a)(7), the Department requires H-1B grants with a start date of July 1, 2016 and later to align with and report on the six WIOA primary indicators of performance, as set forth in WIOA section 116(b)(2). Appendix I to this guidance further describes these indicators, methodologies, and operational parameters.

It is important to note that H-1B grantees are not required to provide outcome targets for these indicators of performance in their grant SOW. The information collected on these measures is

used by the Department to assess performance across numerous programs administered by the Department.

The following WIOA primary indicators of performance are applicable to H-1B grants as described in this guidance:

A. <u>Employment Rate – 2nd Quarter After Exit</u>: The percentage of participants who are in unsubsidized employment during the second quarter after exit from the program.

   The H-1B grants program applies this indicator as it is described in Appendix I to this guidance, with the operating parameters and methodology described there. Additional guidance about reporting against this measure is provided in section 11 of this attachment.

B. <u>Employment Rate – 4th Quarter After Exit</u>: The percentage of participants who are in unsubsidized employment during the fourth quarter after exit from the program.

   The H-1B grants program applies this indicator as it is described in Appendix I to this guidance, with the operating parameters and methodology described there. Additional guidance about reporting against this measure is provided in section 11 of this attachment.

C. <u>Median Earnings – 2nd Quarter After Exit</u>: The median earnings of participants who are in unsubsidized employment during the second quarter after exit from the program.

   The H-1B grants program applies this indicator as it is described in Appendix I to this guidance, with the operating parameters and methodology described there. Additional guidance about reporting against this measure is provided in section 11 of this attachment.

D. <u>Effectiveness in Serving Employers (Retention with the Same Employer 2nd and 4th Quarter After Exit):</u> The percentage of program participants who exit and are employed with the same employer in the second and fourth quarters after exit.

   The H-1B grants program applies this indicator as it is described in Appendix I to this guidance, with the operating parameters and methodology described there. Additional guidance about reporting against this measure is provided in section 11 of this attachment.

E. <u>Credential Attainment</u>: The percentage of those participants enrolled in an education or training program (excluding those in on-the-job training (OJT) and customized training) who attain a recognized postsecondary credential during participation in the program or within one year after exit from the program.

   The H-1B grants program applies this indicator as it is described in Appendix I to this guidance, with the operating parameters and methodology described therein. Note that secondary education training is prohibited in H-1B-funded grants; therefore, the

provision regarding participants who attain secondary school diplomas or their recognized equivalent does not apply to the H-1B grants program.

PIRL data elements that are used to report the credential attainment outcomes for the WIOA primary indicators of performance are also used to report real-time credential attainment outcomes for H-1B grants. As credential attainment is a WIOA primary indicator of performance, H-1B grantees report directly on outcomes related to this indicator through the participant-level data file submitted in WIPS using the PIRL data elements indicated in Appendix IV of this TEGL. In addition, H-1B grantees report on real-time credential attainment outcomes after training completion in WIPS in the quarter they were attained (see section III below).

Reporting credential attainment outcomes for inclusion in both the WIOA primary indicators of performance and also the real-time measures help to determine the success of ETA's training programs and inform technical assistant efforts.

F. <u>Measurable Skill Gains</u>: The percentage of program participants who, during a program year, are in an education or training program that leads to a recognized postsecondary credential or employment and who are achieving measurable skill gains, defined as documented academic, technical, occupational, or other forms of progress, towards such a credential or employment.

The H-1B grants program applies this indicator as it is described in Appendix I to this guidance, with the operating parameters and methodology described there. For additional details, including types of documented progress, see Appendix I.

H-1B program grantees report directly on outcomes related to this indicator through the participant-level data file submitted in WIPS in accordance with the PIRL data elements indicated in Appendix IV of this TEGL.

2. Categories of Enrollment: Reportable Individual, Participant & Date of Program Exit

A. Reportable Individual
This category does not apply to the H-1B grants program.

B. Participant
The H-1B program defines a participant as an individual who receives an H-1B grant - funded service beyond a determination of eligibility.

Please see *Table A – Participation Level Services and Training Activities Chart for H-1B Grants* below that provides a list of H-1B training types and applicable PIRL data element number(s), and the associated PIRL data element code values.

Note that each FOA for an H-1B grant identifies and defines types of eligible participants for that grant.

C. Exit

The H-1B program adopts the definition of exit as stated in section 7 of this guidance.

Note that although the definition of exit in section 7 references that "follow up services" do not change or delay exit, H-1B grant programs cannot use grant funds to provide follow up services to participants after they have exited the program.

D. Common Exit for DOL–Administered Programs Only
This does not apply to the H-1B grant programs. As the H-1B grant programs are not among the required partner programs listed in WIOA section 121(b)(1)(B), States may not include them in a common exit policy.

3. Self-Service and Information-Only Services and Activities
This does not apply to H-1B Grants.

4. Period of Participation
The H-1B grant program adopts the definition of period of participation as stated in section 9 of this guidance.

Reporting Unique Participants
The H-1B grant program does not require a count of unique participants as described in section 9 of this guidance. H-1B program only requires that grantees report on each individual's period of participation. The H-1B grant program anticipates that the majority of participants will each have only one period of participation. In certain instances, a participant who has exited the program may return to receive additional services (*e.g.*, additional educational and job training activities). In such instances, an individual might have multiple periods of participation during the grant period of performance.

Consistent with section 9 of this guidance, the H-1B grant program therefore directs grantees to:

1. Establish a unique identification number (PIRL 100) that will be retained by the same individual across multiple periods of participation during the life of the grant.
2. H-1B grants are not expected to report on the total number of unique participants to the Department; however, the Department may calculate this number based on participant-level data in the WIPS system, which generates quarterly aggregate reports. If the Department determines a need for a unique participant count, the Department will calculate that number on behalf of grantees using participant SSNs provided by grantees.

5. Workforce Integrated Performance System (WIPS) and How to Functionally Report

Reporting H-1B Participant-level Data Through WIPS
The WIPS was made available to H-1B grants in February 2018. Grantees submitted a comprehensive data file of all participants served to date, starting from the beginning of the grant's period of performance through the latest reporting quarter.

The WIPS system will aggregate performance data quarterly in an H-1B program specific QPR Form.

For specific details on WIPS reporting requirements, grantees should review *H-1B Grants Performance Reporting Handbook & Workforce Integrated Performance System (WIPS) Reporting Guidance* for grants whose period of performance began July 1, 2016 and later. The handbook is a supplemental document to this TEGL and provides detailed information on performance outcome measures and performance tracking and reporting of the DOL-only PIRL through WIPS. It also provides instruction on how QNRs will be submitted.

6. **State Annual Report Narratives**
   This does not apply to H-1B Grants.

7. **Eligible Training Provider (ETP) Performance Reporting**
   This does not apply to H-1B Grants.

8. **Pay-for-Performance Reporting**
   While certain H-1B grantees, such as H-1B TechHire grantees, were encouraged to use pay for performance strategies to lower the costs of training, there is no requirement for grantees to report these strategies using PIRL data elements. In particular, grantees should **not** report use of such strategies using the PIRL data element #930 "Pay for Performance," as that data element is exclusive to title I Adult and title I Dislocated Worker core programs. This PIRL data element is not identified for H-1B grants for the purposes of data collection and reporting to DOL. Instead, grantees incorporating a pay for performance strategy should report this in their QNRs, including any successes that the grantee may experience from using this strategy.

9. **Quarterly Narrative Reports for Discretionary Programs**
   H-1B grantees are required to use the *Joint Quarterly Narrative Report Template* (ETA-9179) for quarterly performance narrative reporting. This form was approved for use by the Office of Management and Budget under OMB control no. 1205-0448. H-1B grantees utilize the WIPS to submit and certify QNRs. Additional instructions for completing the QNR in WIPS are included in the H-1B Grants Performance Reporting Handbook & Workforce Integrated Performance System (WIPS) Reporting Guidance and other technical assistance resources.

10. **Use of Social Security Numbers and Direct Wage Match for Performance Reporting**
    In accordance with section 15 of this guidance, H-1B grantees are directed to request participants' SSNs and that information must be reported to the Department through PIRL 2700 in the PIRL. However, while H-1B grantees are required to request participants' SSNs, participants cannot be denied services if they choose to not disclose an SSN. Grantees should also ensure that when they are collecting this information from participants, they

inform the participants of the reason for requesting SSNs, in accordance with the American Competitiveness and Workforce Improvement Act.[1]

Wage Records for Employment-Based Primary Indicators of Performance (A-D)
For the exit-based WIOA primary indicators of performance (each of which has an employment-related component), the Department acknowledges that H-1B program grantees may not have access to wage records in order to track and report exit-based outcomes on employment rates, median earnings and the effectiveness in serving employer measure. Therefore, DOLETA matches wage records on behalf of grantees in order to capture these specific exit-based outcomes for participants that have successfully exited the H-1B program for the following indicators only:

    A. <u>Employment Rate – 2nd Quarter After Exit</u>;
    B. <u>Employment Rate – 4th Quarter After Exit</u>;
    C. <u>Median Earnings – 2nd Quarter After Exit;</u> and
    D. <u>Effectiveness in Serving Employers – Retention with Same Employer 2nd and 4th Quarter After Exit</u>.

The Department calculates these specific exit-based outcomes on behalf of grantees using SSNs provided for each H-1B participant as part of the information included in each grantee's WIPS quarterly participant-level data file submission. It is important to note that while H-1B program grantees are required to collect SSNs, participants cannot be denied services if they choose to not disclose their SSN.

To calculate these exit-based primary indicators of performance, H-1B grants are required to track and report the following PIRL DOL-only DEs:

- PIRL 900: Date of Program Entry;
- PIRL 901: Date of Program Exit;
- PIRL 923: Other Reasons for Exit*; and
  Individuals that are exited for the reasons noted in PIRL 923 will not be calculated in the WIOA primary performance indicators.

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[1] The American Competitiveness and Workforce Improvement Act of 1998, title IV, section 414(c), as amended by the Consolidated Appropriations Act of 2005, division J, title IV, subtitle B, section 428 and WIOA section 512(a), directs the Secretary to require grantees to report on the employment outcomes obtained by workers receiving training under this subsection using indicators of performance that are consistent with other indicators used for employment and training programs administered by the Secretary, such as entry into employment, retention in employment, and increases in earnings. The principal purpose for collecting this information is to administer the program, including tracking and evaluating participant progress. For individuals seeking or receiving services under an H-1B grant, providing this information, including a social security number (SSN), is voluntary; failure to disclose a SSN will not result in the denial of any right, benefit or privilege to which the participant is entitled. The information that is collected will be retained in the program files of the grantee and may be released to other Department officials in the performance of their official duties.

- PIRL 2700: Social Security Number.

11. Supplemental Wage Information

As the reporting timelines for the exit-based WIOA primary indicators of performance generally fall after the conclusion of the grant's period of performance, the Department calculates these measures on behalf of grantees using SSNs provided for each H-1B participant as part of the information included in each grantee's WIPS quarterly participant-level data file submission. Therefore, H-1B grantees are not authorized to collect supplemental data for the purposes of reporting the following measures:

A. Employment Rate – 2nd Quarter After Exit;
B. Employment Rate – 4th Quarter After Exit;
C. Median Earnings – 2nd Quarter After Exit; and
D. Effectiveness in Serving Employers – Retention with the Same Employer 2nd and 4th Quarter After Exit.

Grantees may use supplemental data to track and report real-time employment outcomes, which are separate from and in addition to the exit-based WIOA primary indicators of performance employment outcomes. Therefore, H-1B program grantees are directed to follow section 17 of this guidance, regarding the voluntary collection of supplemental wage information, when reliance on such information is necessary for verifying and reporting on real-time employment-related performance measures alone.

III.   Unique Features of H-1B Grants

H-1B Grants Performance Outcomes: "Real-Time" Performance Measures

In addition to the WIOA primary indicators of performance, grantees are required to track and report "real-time" employment and training outcome measures for program participants in the reporting quarter in which the outcome occurred. Grantees provide outcome targets for these performance indicators in their SOWs, and the targets set for these measures are used to evaluate program outcomes during the period of performance. Real-time data helps grantees benchmark their progress against their target outcomes and is indicative of success for the most recent reporting quarter.

H-1B grants "real-time" performance measures include:
1. total participants served;
2. total participants enrolled in education/training activities;
3. total participants completing education/training activities;
4. total participants who complete education/training activities and receive a degree, or other type of credential;
   a. It is important to note that this credential measure is separate from and in addition to the WIOA primary indicators of performance "Credential Attainment."
5. total number of unemployed and underemployed participants who complete education/training activities and obtain employment; and
   a. It is important to note that this entered employment measure is separate from and in addition to the WIOA primary indicators of performance "Employment Rate."

6. Total number of incumbent worker participants who complete training activities and that advance into a new position.

For complete guidance on reporting real-time performance measures, please refer to *H-1B Grants Performance Reporting Handbook & Workforce Integrated Performance System (WIPS) Reporting Guidance* (https://h1bskillstraining.workforcegps.org/resources/2017/07/07/12/48/H-1B_Grants_Performance_Reporting_Handbook_-_WIPS_Reporting_Guidance).

Definitions of Terms Related To the Performance Accountability System (Appendix II)
Appendix II of this guidance provides definitions of terms related to the performance accountability system. This section summarizes which of these terms are (1) applicable to H-1B grants; (2) are not applicable to H-1B grants; and (3) also provides the definition or citations to the definition for specific terms unique to H-1B grants.

Terms That Apply to H-1B Grant Programs:
The following terms, as defined in Appendix II of this guidance, are applicable to H-1B grants:

- Employment;
- Participant Individual Record Layout (PIRL);
- Secondary School Diploma; and
- Unsubsidized employment.

Terms Unique to H-1B Grant Programs[2]:
In addition to the differences in terms described in section II of this attachment, the following terms identified in the TEGL have different definitions for H-1B grants and are defined as follows:
- Incumbent Worker – H-1B grants have a unique definition of incumbent worker and incumbent worker training. H-1B grants should apply the definition of this term as indicated in their grant FOA.
- Customized Training – H-1B grants have a unique definition of customized training. For H-1B grants, it is defined as training that is designed to meet the special requirements of an employer (or group of employers); and is conducted with a commitment by the employer to employ, or in the case of incumbent workers, continue to employ, the individual on successful completion of the training.

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[2] **Note:** H-1B grants should review the applicable FOA, as well as the *H-1B Grants Performance Reporting Handbook & Workforce Integrated Performance System (WIPS) Reporting Guidance* (https://h1bskillstraining.workforcegps.org/resources/2017/07/07/12/48/H-1B_Grants_Performance_Reporting_Handbook_-_WIPS_Reporting_Guidance) for the specific definitions of terms that apply to their specific H-1B grant funded program.

Table A – Participation Level Services and Training Activities Chart for H-1B Grants

Definition of Participant: Any individual who receives an H-1B grant-funded service beyond a determination of eligibility is considered a participant.

Service Type	Applicable PIRL Data Element Number (s) *Select appropriate data element as it applies	PIRL Data Element Code Values *Select appropriate code value as it applies	Notes
	Services		
Case Management Service	**PIRL 2102:** Previous Quarter Received Case Management Service	1 = the participant received Case Management Services in the previous quarter. 0 = the participant did not receive Case Management Services in the previous quarter.	
	PIRL 902: Date of First Case Management and Employment Service	Record the date on which the participant begins receiving his/her first case management and employment service funded by a program following a determination of eligibility to participate in the program.	
Assessment Services	**PIRL 2104:** Previous Quarter Received Assessment Services	1 = the participant received Assessment Services in the previous quarter. 0 = the participant did not receive Assessment Services in the previous quarter.	
	PIRL 2103: Most Recent Date Received Assessment Services	Record the most recent date on which the participant received assessment services funded by the program.	
Supportive Services	**PIRL 2105:** Previous Quarter Received Supportive Services	1 = the participant received Supportive Services in the previous quarter. 0 = the participant did not receive Supportive Services in the previous quarter.	
	PIRL 1409: Most Recent Date Received	Use the appropriate code to indicate the primary type of	

	Supportive Services	training being provided to the participant. Leave blank if the participant did not enroll in training for Primary Type of Training Service for Training Activity #1.	
Specialized Services	**PIRL 2107:** Previous Quarter Received Specialized Services	1 = the participant received Specialized Services in the previous quarter. 0 = the participant did not receive Specialized Services in the previous quarter.	
	PIRL 2106: Most Recent Date Received Specialized Participant Services	Record the most recent date on which the participant received specialized participant services which include, but are not limited to, financial counseling, behavioral health counseling, mentoring, assistance with re-location, job coaching, networking, and job search assistance. Leave blank if the participant did not receive Specialized Participant Services.	
Paid Work Experience	**PIRL 2108:** Previous Quarter Participated in Work Experience	1 = the participant participated in Work Experience in the previous quarter. 0 = the participant did not participate in Work Experience in the previous quarter.	
	PIRL 1205: Type of Work Experience	1 = the participant participated in summer employment or an internship during the summer months (WIOA Youth). 2 = the participant participated in an internship or employment opportunity during the non-summer 3 = the participant participated in a pre-apprenticeship program. 4 = the participant participated in job shadowing. 5 = the participant participated in on-the-job training (WIOA Youth). 6 = the participant participated in a	H-1B grants will only have the option to select the following code values: 2 = the participant participated in an internship or employment opportunity during the non-summer 3 = the participant participated in a pre-apprenticeship program. 4 = the participant participated in job shadowing. 7 = the participant participated in another type of work experience not covered in 1 through 5.

		transitional job, as defined in WIOA section 134(d)(5). 7 = the participant participated in another type of work experience not covered in 1 through 5. 0 = the participant did not participate in a work experience. Leave blank if this data element does not apply to the participant.	0 = the participant did not participate in a work experience. OR blank
Training Activities	**Applicable PIRL Data Element Number (s)** *Select appropriate data element as it applies	**PIRL Data Element Code Values** *Select appropriate code value as it applies	**Notes**
H-1B Training Activities	**PIRL 1303, PIRL 1310, PIRL 1315:** Type of Training Service #1, #2, #3 (WIOA)	01 = On the Job Training (non-WIOA Youth). 02 = Skill Upgrading 03 = Entrepreneurial Training (non-WIOA Youth) 04 = ABE or ESL (contextualized or other) in conjunction with Training 05 = Customized Training 06 = Occupational Skills Training (non-WIOA Youth) 07 = ABE or ESL (contextualized or other) NOT in conjunction with training (funded by Trade Adjustment Assistance only) 08 = Prerequisite Training 09 = Registered Apprenticeship 10 = Youth Occupational Skills Training 11 = Other Non-Occupational-Skills Training 12 = Job Readiness Training in conjunction with other training 00 = No Training Service	H-1B grants will only have the option to select the following code values: 01 = On the Job Training (non-WIOA Youth). 02 = Skill Upgrading 05 = Customized Training 06 = Occupational Skills Training (non-WIOA Youth) 09 = Registered Apprenticeship 00= No Training Service

	PIRL 2109, PIRL 2110 and PIRL 2111: Primary, Secondary and Tertiary Type of Training Service for Training Activity #1 **PIRL 2112, PIRL 2113, PIRL 2114:** Primary, Secondary and Tertiary Type of Training Service for Training Activity #2 **PIRL 2115, PIRL 2116 and PIRL 2117:** Primary, Secondary and Tertiary Type of Training Service for Training Activity #3	1 = On-the-Job Training 2 = Classroom Occupational Training 3 = Contextualized Learning 4 = Distance Learning 5 = Customized Learning 6 = Incumbent Worker Training 7 = Other Occupational Skills Training 8 = Registered Apprenticeship 0 = No training	The WIOA Workforce Integrated Performance System, (WIPS) is designed to capture three planned training activities and up to three types of training services per individual served in the H-1B grant program. As a result, grantees can record up to nine training types within three training activities for each participant record in the WIPS reporting platform. In total, up to nine training types can be recorded within three Training Activity dates.
Incumbent Worker Training	**PIRL 907:** Recipient of Incumbent Worker Training	4 = H-1B Grants	This data element is only reported for incumbent workers
Registered Apprenticeship	**PIRL 931:** Registered Apprenticeship Program	1 = the participant entered into a Registered Apprenticeship program or if the participant was a registered apprentice at the time of program entry. 0 = the participant did not enter into a Registered Apprenticeship program 9 = grantee is unable to track enrollment in the program	
Secondary Education Training	**PIRL 1401**: Enrolled in Secondary Education Program (WIOA)	0 = No	**Important note**: Secondary education training is prohibited in H-1B-funded grants. However, this element is required to generate a credential attainment rate in WIPS and therefore must always be coded as "0."