

<b>TRAINING AND EMPLOYMENT NOTICE</b>	<b>NO.</b> 19-22, Change 1
	<b>DATE</b> March 31, 2023

**TO:** STATE AND LOCAL STAKEHOLDERS IN THE WORKFORCE  
 INNOVATION AND OPPORTUNITY ACT  
 STATE WORKFORCE AGENCIES  
 STATE WORKFORCE ADMINISTRATORS  
 STATE WORKFORCE LIAISONS  
 H-1B SKILLS TRAINING PROGRAM GRANTEES  
 INDIAN AND NATIVE AMERICAN (INA) PROGRAM GRANTEES  
 JOB CORPS CONTRACTORS  
 JOBS FOR VETERANS STATE GRANTS (JVSG) GRANTEES  
 OFFICE OF UNEMPLOYMENT INSURANCE (OUI)  
 NATIONAL FARMWORKER JOBS PROGRAM GRANTEES  
 NATIONAL DISLOCATED WORKER GRANTEES  
 STATE APPRENTICESHIP AGENCIES  
 OFFICE OF APPRENTICESHIP (OA) STATE DIRECTORS  
 APPRENTICESHIP GRANT RECIPIENTS (OA-MANAGED)  
 REENTRY EMPLOYMENT OPPORTUNITIES (REO) GRANTEES  
 SENIOR COMMUNITY SERVICE EMPLOYMENT PROGRAM  
 (SCSEP) GRANTEES  
 TRADE ADJUSTMENT ASSISTANCE (TAA) LEADS  
 YOUTHBUILD GRANTEES  
 STRENGTHENING COMMUNITY COLLEGES TRAINING (SCC)  
 GRANTEES

**FROM:** BRENT PARTON /s/  
 Acting Assistant Secretary

**SUBJECT:** Change 1 to Training and Employment Notice No. 19-22: *Reporting Training in the U.S. Department of Labor's (DOL) Participant Individual Record Layout (PIRL)*

1. **Purpose.** To correct an error in Attachment I of Training and Employment Notice (TEN) No. 19-22 and rescind TEN No. 19-22. TEN No. 19-22, Change 1 provides clarification and alignment of the reporting of training types in the Participant Individual Record Layout (PIRL) and promotes consistent and reliable data analysis across the DOL's employment and training programs.
2. **Action Requested.** The Department of Labor's (Department) Employment and Training Administration (ETA) requests grant recipients distribute this information to the appropriate staff, grant partners, and other stakeholders as appropriate.

### **3. Summary and Background.**

- a. Summary – This Change 1 to TEN No. 19-22 corrects an error in Attachment I of TEN No. 19-22, clarifying that On-the-Job Training (OJT) is an allowable type of training for the WIOA Dislocated Worker program and rescinds TEN No. 19-22. TEN No. 19-22, Change 1 provides common language for interpreting reporting definitions, types of training, reporting multiple trainings, and identifying areas where the various ETA programs differ. This enables more consistent tracking of trainings across grantees and across programs to facilitate making this data readily comparable.
- b. Background – The Department recognizes that there are significant variations across states and grantees in how training is reported for performance purposes. This is likely due to differing interpretations of what constitutes training, how to report multiple trainings, or how to differentiate training types when reporting performance outcomes. ETA has provided specific performance guidance and technical assistance through recent guidance such as Training and Employment Guidance Letter (TEGL) No. 10-16, Change 2, TEGL No. 14-18, TEGL No. 23-19, and other grant specific individualized technical assistance. However, there are no cross-program materials regarding how to interpret these reporting requirements. This notice is intended to supplement existing policy guidance and encourage more consistency in performance reporting as well as identify where specific grant programs differ. Consistent performance data allows ETA and grantees to accurately measure program progress and impact.

### **4. Training Reporting Clarifications for the DOL PIRL**

The reporting clarifications provided in this notice provide general guidelines for understanding reporting of training in the DOL PIRL. However, a number of program-specific notations and differences can be found in Attachment II of this notice.

#### **a. Definitions Regarding Reporting Training**

This section provides some common definitions for understanding the scope of training in the PIRL such as the definition of training; when enrollment, entry, and training ending occurs; and other important definitions around training. These definitions are intended only to align reporting within the PIRL and *does not change* program-specific requirements for the provision of benefits or services.

#### **i. Training**

The Department's various workforce development programs all broadly define training as programs that have the purpose of developing skills and qualifications to attain employment. However, based on the needs of individual programs there may be differences which are spelled out in Attachment I. This definition only applies to the reporting of training services in participant reporting and does not change individual program requirements.

Activities such as short-term, task-oriented skills development or that are related to general skills within one or more industries or occupations (such as

writing, leadership, resume workshops or health and safety certifications, etc.) are not considered training as they do not prepare individuals with the competencies required to perform a specific occupation. Similarly, short-term work experience, internships, or job shadowing experiences that do not have a formal skills development curriculum leading towards an occupational goal are not considered training.

Note, that certain services such as Adult Basic Education (ABE), English as a Second Language (ESL), or Job Readiness Training do not generally meet the definition of training, but should be reported as a separate training type when provided in conjunction with training services as described in Section b.

**ii. Enrollment in Training**

The enrollment date in a training program is considered the first day that a participant attends the training (either virtually or in person) for the purposes of reporting *Training Leading to an Associate's Degree* (PIRL 1331) and *Date Enrolled During Program Participation in an Education or Training Program Leading to a Recognized Postsecondary Credential or Employment* (PIRL 1811), as applicable. If the training meets the additional criteria in the enrollment element, the enrollment date will be the same as the training entry date.

**iii. Training Entry**

Training entry occurs on the first day that a participant attends a training program. This date should be reflected in *Date Entered Training #1* (PIRL 1302), *Date Entered Training #2* (PIRL 1309), and *Date Entered Training #3* (PIRL 1314), as applicable.

**iv. End of Training**

The date on which a training program ends is the last date the participant attended any service provided as part of that training, including the dates of examinations if they were provided as part of the service. This date should be reflected in *Date Completed, or Withdrew from, Training #1* (PIRL 1308), *Date Completed, or Withdrew from, Training #2* (PIRL 1313), *Date Completed, or Withdrew from, Training #3* (PIRL 1318). *Date Completed, During Program Participation, an Education or Training Program Leading to a Recognized Postsecondary Credential or Employment* (PIRL 1813), if applicable, should be populated on completion of the last planned training that meets the requirement in the participation.

**v. Program of Study**

Consistent with TEGL No. 08-19, *Workforce Innovation and Opportunity Act (WIOA) Title I Training Provider Eligibility and State List of Eligible Training Providers (ETPs) and Programs*, a program of study is defined as one or more courses or classes, or a structured regimen that provides job-driven training services and leads to a recognized post-secondary credential,

which includes an industry-recognized certificate or certification, a certificate of completion of a registered apprenticeship, a license recognized by the state involved or Federal Government, secondary school diploma or its equivalent, employment, or measurable skill gains toward a recognized postsecondary or secondary school diploma or its equivalent credential or employment. These training services may be delivered in person, online, or in a blended approach.

**vi. Incumbent Worker Training (IWT)**

IWT is a training provided to incumbent workers (TEGL No. 19-16, *Guidance on Services provided through the Adult and Dislocated Worker Programs under the Workforce Innovation and Opportunity Act (WIOA) and the Wagner-Peyser Act Employment Service (ES), as amended by Title III of WIOA, and for Implementation of the WIOA Final Rules*) to either help avert a potential layoff or provide the skills necessary to retain employment, such as increasing the skill levels of employees so they can be promoted within the company and create backfill opportunities for less-skilled employees. If provided, the training should be reported under the appropriate funding source in *Recipient of Incumbent Worker Training* (PIRL 907).

**vii. Pre-Apprenticeship**

A pre-apprenticeship program is considered a type of work experience and should be reported in *Type of Work Experience* (PIRL 1205) as a pre-apprenticeship program (3), if collected. If the pre-apprenticeship program includes an occupational skills training component that is separate from the work experience, the occupational skills training component should also be reported in the PIRL as a training in using *Type of Training Service #1 (WIOA)* (PIRL 1303), *Type of Training Service #2 (WIOA)* (PIRL 1310), or *Type of Training Service #3 (WIOA)* (PIRL 1315), as applicable.

**b. Training Types**

The PIRL collects information on the types of training provided to each participant in *Type of Training Service #1* (PIRL 1303), *Type of Training Service #2* (PIRL 1310), and *Type of Training Service #3* (PIRL 1315). These elements are critical to tracking training provided to participants in DOL programs and this section attempts to clarify when to report various training types.

Training types available in *Type of Training Service #1* (PIRL 1303), *Type of Training Service #2* (PIRL 1310), and *Type of Training Service #3* (PIRL 1315) are as follows:

- 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

Please note that these training types are not applicable to all ETA programs and specific programs may not report all these code values. Grantees should refer to the performance guidance provided by their specific program and Attachment I to this guidance.

**i. Explanations of Training Types**

The following explanations are intended to aid grantees in selecting the appropriate training types for the purposes of reporting in the PIRL. It does not affect the definitions, available types of trainings, or conditions for providing these types of training established for the program that is reporting.

**1. On the Job Training (OJT)**

An OJT is a work-based training provided under contract with an employer that provides knowledge or skills to become proficient in the occupation for which they are being trained. Trainings may include both a paid work-based learning component and instructional component, which may be provided at the employment site, at educational institutions, other locations, or virtually. Participants receiving this type of training should be reported with On the Job Training (non-WIOA Youth) (01) in *Type of Training Service #1* (PIRL 1303), *Type of Training Service #2* (PIRL 1310), or *Type of Training Service #3* (PIRL 1315), as applicable.

**2. Skills Upgrading Training**

Skills Upgrading training type should be reported for training that provides additional skills or certifications within the participant's specific occupational field and where no more specific training type is applicable. Skills Upgrading (02) is differentiated from Occupational Skills Training (06) because the occupational goal is within a field for which the participant already has experience or training. Participants receiving this type of training should be reported with Skills Upgrading (02) in *Type of Training Service #1* (PIRL 1303), *Type of Training Service #2* (PIRL 1310), or *Type of Training Service #3* (PIRL 1315), as applicable.

**3. Entrepreneurial Training**

Entrepreneurial Training is training focused on developing the skills for starting and operating small businesses or self-employment. Participants receiving this type of training should be reported with Entrepreneurial Training (non-WIOA Youth) (03) in *Type of Training Service #1* (PIRL

1303), *Type of Training Service #2* (PIRL 1310), or *Type of Training Service #3* (PIRL 1315), as applicable.

#### **4. Adult Basic Education (ABE) or English as a Second Language (ESL) in Conjunction with Training**

When ABE or ESL is provided in conjunction with other training, such as occupational skills training, this training should be reported as a separate training as described in Section c to allow for tracking of the ABE or ESL component. That training should be reported with ABE or ESL (contextualized or other) in conjunction with Training (04) in *Type of Training Service #1* (PIRL 1303), *Type of Training Service #2* (PIRL 1310), or *Type of Training Service #3* (PIRL 1315), as applicable.

#### **5. Customized Training**

Customized training is designed to meet the special requirements of a single employer or a group of employers and is provided by that/those employer(s) with a commitment to employ the worker upon successful completion of the training. Participants receiving this type of training should be reported with Customized Training (05) in *Type of Training Service #1* (PIRL 1303), *Type of Training Service #2* (PIRL 1310), or *Type of Training Service #3* (PIRL 1315), as applicable.

#### **6. Occupational Skills Training**

Occupational Skills training type should be reported for training that provides skills or certifications for a participant to move into a new or different occupation from one that the participant previously had experience or training. Occupational Skills Training (06) is differentiated from Skills Upgrading (02) because the occupational goal is outside of a field for which the participant already has experience or training. Participants receiving this type of training should be reported with Occupational Skills Training (non-WIOA Youth) (06) in *Type of Training Service #1* (PIRL 1303), *Type of Training Service #2* (PIRL 1310), or *Type of Training Service #3* (PIRL 1315), as applicable.

Please note that for WIOA Youth, YouthBuild, and REO Youth, and Jobs Corp program participants, youth occupational skills training should be selected for youth in occupational skills training rather than this code value.

**7. Adult Basic Education (ABE) or English as a Second Language (ESL) Not in Conjunction with Training**

ABE or ESL training provided not in conjunction with another training component, such as occupational skills training, should be reported as ABE or ESL (contextualized or other) NOT in conjunction with training (funded by Trade Adjustment Assistance only) (07) in *Type of Training Service #1* (PIRL 1303), *Type of Training Service #2* (PIRL 1310), or *Type of Training Service #3* (PIRL 1315), as applicable. ABE or ESL not in conjunction with other training is only available within the Trade Adjustment Assistance (TAA) program.

**8. Prerequisite Training**

Prerequisite training consists of a separate, distinct training as described in Section c that satisfies requirements for participating in a subsequent, planned training. Prerequisite training may be the only training at certain times during participation or if the participant discontinues receiving training services, but typically participants have two or more trainings reported in the PIRL if a prerequisite training is provided. Participants receiving this type of training should be reported with Prerequisite Training (08) in *Type of Training Service #1* (PIRL 1303), *Type of Training Service #2* (PIRL 1310), or *Type of Training Service #3* (PIRL 1315), as applicable.

**9. Registered Apprenticeship Training**

Registered Apprenticeship is a training provided under the National Apprenticeship Act (29 U.S.C. 50 *et seq.*). These trainings include both a structured, paid work-based learning component and required, related educational or instructional component. Participants receiving this type of training should be reported with Registered Apprenticeship (09) in *Type of Training Service #1* (PIRL 1303), *Type of Training Service #2* (PIRL 1310), or *Type of Training Service #3* (PIRL 1315), as applicable.

**10. Youth Occupational Skills Training**

Occupational skills training provided under WIOA Youth, YouthBuild and Reentry Employment Opportunities (REO) Youth should be reported with Youth Occupational Skills Training (10) in *Type of Training Service #1* (PIRL 1303), *Type of Training Service #2* (PIRL 1310), or *Type of Training Service #3* (PIRL 1315), as applicable.

**11. Other Non-Occupational-Skills Training**

Other Non-Occupational-Skills Training (11) is a coding value that should only be selected if no other training type is applicable to the provided training service.

**12. Job Readiness Training in Conjunction with Other Training**

Job Readiness Training provides for fundamental skills for finding a job and meeting general job requirements that are not specific to an

occupation. Many job readiness services do not meet the definition of training for the purposes of PIRL reporting as described in Section a, but when provided in conjunction with other training, such as occupational skills training, this training should be reported as a separate training as described in Section c to allow for tracking of these services. That training should be reported with Job Readiness Training in conjunction with other training (12) in *Type of Training Service #1* (PIRL 1303), *Type of Training Service #2* (PIRL 1310), or *Type of Training Service #3* (PIRL 1315), as applicable.

**ii. More than One Applicable Training Type**

If more than one training type can characterize a single training, grantees should report the most specific code that best categorizes the training, and the training should be reported consistently for all participants.

The following list of priorities is intended to help determine what is considered the most specific code:

- On the Job Training (01), Customized Training (05), and Registered Apprenticeship (09) are all considered more specific than other training types because of the narrower definition of these trainings.
- Registered Apprenticeship (09) is considered the most specific type of training.
- Customized Training (05) is considered more specific than On the Job Training (01) due to the specific needs of the employer or group of employers.
- ABE or ESL Trainings (04 and 07) are considered more specific than Prerequisite Training (08).
- Skills Upgrading (02), Occupational Skills Training (06), and other Non-Occupational-Skills Training (11) are considered the least specific types of training and should only be selected if more specific types are not applicable.

Examples:

1. If a participant is receiving training that is a prerequisite for another program of study that includes occupational skills, the training should be reported with the more specific Prerequisite Training (08) code.
2. If a participant is receiving ESL training that is a prerequisite for another program of study, the training should be reported as ABE or ESL (contextualized or other) in conjunction with Training (04).
3. If a non-WIOA Youth participant is receiving one program of study that includes some courses that are prerequisites before further occupational skills training, the training should be reported as Occupational Skills Training (non-WIOA Youth) (06) because prerequisite does not describe the training broadly.



**c. Multiple Trainings for the Purposes of Reporting**

The PIRL allows for the collection of information on up to three different trainings in the data elements using *Type of Training Service #1 (WIOA)* (PIRL 1303), *Type of Training Service #2 (WIOA)* (PIRL 1310), or *Type of Training Service #3 (WIOA)* (PIRL 1315). This section provides a general framework for understanding when to report in a subsequent set of training elements. DOL recognizes that training models vary extensively and may not cleanly fit in what is provided.

**i. Same Training**

The following factors would generally not result in the utilization of a new set of training elements:

- More than one training provider used to complete the training;
- A training occurs across multiple academic calendar periods;
- Multiple sources of funding are used to fund the training;
- Participant is co-enrolled in multiple programs;
- Training includes multiple formats, modalities, or delivery methods; or
- Gaps of time between instruction in the same training course.

Examples:

1. A participant is in a Registered Apprenticeship program which includes components that lead to several interim credentials.
2. A training provider shuts its doors and the grantee helps the participant transfer to a different provider to complete the training.

**ii. Different Training**

The following factors should generally result in the utilization of a new set of training elements:

- A new program of study is started leading to a new credential;
- Development of a new occupational goal accompanied with meaningful modifications to the participant's training plan;
- Start of a new program of study after an initial training has been completed; or
- Concurrent programs of study with different training types.

Examples:

1. A participant takes a grant-sponsored Information Technology (IT) classroom training leading to a recognized credential. The participant completes the training and receives a credential, but later decides to take a second grant-sponsored training leading to an additional credential to move further along a career pathway.
2. A participant is receiving occupational skills training while simultaneously receiving Adult Basic Education (ABE) or English as a Second Language (ESL) training.

### iii. Reporting Order

If a participant receives more than one training, the training that the participant attended earliest should be added as the first training with the remaining training in the order that the participant attended them. When the participant receives more than three trainings, then the first, second, and final trainings should be reported.

5. **Inquiries.** Please direct inquiries to the appropriate Regional Office.

### 6. **References.**

- Workforce Innovation and Opportunity Act (WIOA), Pub. L. 113-128;
- National Apprenticeship Act (as amended), 29 U.S.C. 50, et seq.;
- Section 414(c) of the American Competitiveness and Workforce Improvement Act of 1998 (Div. C, Title IV of Pub. L. 105-277) (as amended), 29 U.S.C. 3224a;
- Trade Act of 1974, as amended, 19 U.S.C. 2271 et seq., including specifically but without limitation, amendments enacted in the Trade Adjustment Assistance Reauthorization Act of 2015 (Title IV of Pub. L. 114-27);
- Elementary and Secondary Education Act, as amended by the Every Student Succeeds Act, 20 U.S.C 6301, et seq.;
- WIOA Joint Rule for United and Combined State Plans, Performance Accountability, and the One-Stop System Joint Provisions, 81 Fed. Reg. 55791 (Aug. 19, 2016);
- Workforce Investment and Opportunity Act Final Rule, 81 Fed. Reg. 56071 (Aug. 19, 2016);
- OMB Control Number 1205-0526, WIOA Participant Individual Record Layout;
- OMB Control Number 1205-0521, WIOA DOL-only Participant Individual Record Layout;
- TEN No. 25-19, *Understanding Postsecondary Credentials in the Public Workforce System*, dated June 8, 2020;
- TEGL No. 23-19, Change 1, *Guidance for Validating Required Performance Data Submitted by Grant Recipients of U.S. Department of Labor (DOL) Workforce Programs*, dated October 25, 2022;
- TEGL No. 14-18, *Aligning Performance Accountability Reporting, Definitions, and Policies Across Workforce Employment and Training Programs Administered by the U.S. Department of Labor (DOL)*, dated March 25, 2019;
- TEGL No. 10-16, Change 2, *Performance Accountability Guidance for Workforce Innovation and Opportunity Act (WIOA) Core Programs*, dated September 15, 2022;
- TEGL No. 13-16, *Guidance on Registered Apprenticeship Provisions and Opportunities in the Workforce Innovation and Opportunity Act (WIOA)*, dated January 12, 2017;
- TEGL No. 18-16, Change 1, *Change 1 to Training and Employment Guidance Letter 18-16, Program Eligibility and Enrollment Guidance for the National Farmworker Jobs Program*, dated July 12, 2021;

- TEGL No. 19-16, *Guidance on Services provided through the Adult and Dislocated Worker Programs under the Workforce Innovation and Opportunity Act (WIOA) and the Wagner-Peyser Act Employment Service (ES), as amended by title III of WIOA, and for Implementation of the WIOA Final Rules*, dated March 1, 2017;
- TEGL No. 21-16, Change 1, *Change 1 to Training and Employment Guidance Letter (TEGL) 21-16 Third Workforce Innovation and Opportunity Act (WIOA) Title I Youth Formula Program Guidance*, dated July 30, 2021.
- TEGL No. 21-16, *Third Workforce Innovation and Opportunity Act (WIOA) Title I Youth Formula Program Guidance*, dated March 2, 2017;
- TEGL No. 26-16, *Guidance on the use of Supplemental Wage Information to implement the Performance Accountability Requirements under the Workforce Innovation and Opportunity Act*, dated June 1, 2017;
- TEGL No. 07-16, *Data Matching to Facilitate WIOA Performance Reporting*, dated August 23, 2016;
- TEGL 03-18, *Eligible Training Provider (ETP) Reporting Guidance under the Workforce Innovation and Opportunity Act (WIOA)*, dated August 31, 2018;
- TEGL 05-18, *Workforce Innovation and Opportunity Act (WIOA) Annual Statewide Performance Report Narrative*, dated November 7, 2018;
- TEN No. 44-11, *Encouraging Enhanced Partnerships and Collaboration between the Workforce Investment System and Registered Apprenticeship Programs*, dated May 10, 2012;
- TEN No. 08-16, *Implementation of an Integrated Performance Reporting System for Multiple Employment and Training Administration (ETA) and Veterans' Employment and Training Service (VETS) Administered Programs*, dated August 24, 2016; and
- TEGL No. 08-19, *Workforce Innovation and Opportunity Act (WIOA) Title I Training Provider Eligibility and State List of Eligible Training Providers (ETPs) and Programs*, dated January 2, 2020.

## 7. **Attachment(s).**

- Attachment I: Allowable Training Types by Program
- Attachment II: Program-Specific Differences and Notations