WIOA | Eligible Training Provider

Performance Reporting Requirements

(rev. 10/2021)
PRESENTATION PURPOSE AND OBJECTIVES

1. Background
2. Review of Reporting Requirements
3. Demonstration of How to Report Student Information
4. Corrective Actions and Sanctions
5. Questions and Answers
Background
WIOA requires that states submit performance and outcome data for **ALL individuals** receiving training in an Eligible Training Provider (ETP) program of study, not just for WIOA participants.

Recognizing the difficulties these reporting requirements imposed upon many ETPs, Rhode Island (and many other states) requested a waiver of these reporting requirements from DOL-ETA, and received one for the initial reporting years.

On January 2, 2020, DOL-ETA issued TEGL 08-19, which rescinded TEGL 41-14, and informed all states that they would be discontinuing state use of this waiver, effective June 30, 2021.

In June of 2021, Rhode Island once again sought a waiver of these reporting requirements, but was informed on August 13, 2021, that the waiver request had been denied.

The State has been informed that it must report all student performance information in our Program Year 2021 Report, which is due to DOL-ETA on October 1, 2022.
Background
All Student Reporting Requirements
All Student Reporting (WIOA and NON-WIOA)

- ETP performance reports include information on everyone served by the program of study.
- All students served (even those that are not WIOA participants) must be included.
- Information must be reported even if no WIOA participants were enrolled/served during the reporting timeframe.
- Reporting is for the program of study only.
- There are different requirements and breakouts for students that are WIOA participants.
All Student Reporting (WIOA and NON-WIOA)

All Students

- SSN/ITIN (123456789)
- Entry Date (MM/DD/YYYY)
- Exit Date (MM/DD/YYYY)
- Program Outcome (Completion, Withdrawal, Credential, Termination, In Progress)

WIOA Participants

- Demographics
- WIOA Program Population
- Total Training Cost

Required information is defined in the ETA-9171
• Performance page appears to allow *aggregate* reporting, but that is not the case as doing so would require access to the USDOL's State Wage Interchange System (SWIS) for verification.

• For similar reason, *self-attestation* of participant outcomes is not sufficient to meet this requirement.
The Family Educational Rights and Privacy Act (FERPA) is a federal law that protects students’ right to privacy of their educational records and information. Under FERPA, an eligible student, or his or her parent, must provide written consent before the educational agency or institution can disclose personally identifiable information (PII), unless a listed exception applies. Joint guidance, issued in 2016 by the US Departments of Labor and Education, clarifies FERPA’s audit and evaluation exception as it relates to WIOA’s ETPs and programs. DLT is using its audit and evaluation authority to collect information on students, so that program performance information is provided to the public, in aggregate form—as required by WIOA—on the statewide ETPL.

See: Training and Employment Guidance Letter (TEGL) 07-16, issued on August 23, 2016, by the US Department of Labor Employment and Training Administration (DOLETA)
How to Report Student Information
Reporting Process

1. **Login to EmployRI**
   - Using your training provider login

2. **Download Reporting Workbook**
   - For current program year

3. **Enter student data**
   - For each training program

4. **Upload completed workbook**
   - One workbook per quarter (with data cumulative for Program Year-to-Date) for your institution

5. **Check for successful upload**
   - If unsuccessful, view error report to see where issues occurred

For each training program
1. Once logged into EmployRI, click **MENU**
Reporting Process – Step 2

2. Access “Manage Program Performance” from Menu (Under Services for Providers section)
### Reporting Process – Step 3

3. Click on “Download Workbook” from Menu (on the Manage Program Performance page)

- Workbook is *autogenerated* based on the ETP’s program(s) of study

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Reporting Process – Step 4

4. Review “Instructions” Tab in the Workbook, including definitions for each field and data element.

- Review the workbook after filling it out.
- Create a copy of the file.
- Ensure the Save As dialog box, in the Save as type field, select Excel Workbook (*.xls). THIS IS THE ONLY FORMAT SUPPORTED BY THE UPLOAD PROCESS.
- Enter the filename, enter a name for your workbook (example: program_performance_2023-11-14.xls)
- Click Save to finish.

Entering Performance Information

**ID#**
- mandatory (10-digit) number Enter all students who were enrolled or exited during the program year. A missing ID# entry will result in an error message and upload failure. If the ID# is not available, please enter a pseudo-ID# (e.g. Student ID): **”** Please note: Invalid ID#s will affect employment performance outcomes.

**Start Data**
- Enter the date for all students who were enrolled or exited during the program year. The Start Date must be in MM/DD/YYYY format and cannot be a future date. A missing or invalid Start Date entry will result in an error message and upload failure.

**Status**
- Status results from the drop-down list for all students (selection options: Enrolled, Completed, Withdrawn, or Transferred). A missing or invalid Status entry will result in an error message and upload failure.

**Credentialed**
- Enter the number of students who met the credentialing requirements. The credential must be in MM/DD/YYYY format and cannot be a future date or earlier than the start date. A missing or invalid Date entry will result in an error message and upload failure.
Reporting Process – Step 5

5. Review “Summary” Tab in the Workbook to see a list of all Programs of Study associated with the ETP
6. Review **All Numerical Tabs** in the Workbook and enter student information accordingly

- Once all student information is entered, save Workbook to a secure location on your computer
Reporting Process – Step 7

7. Click on “Select File” from Menu (on the Manage Program Performance page)

- Locate the previously saved workbook on your computer and select it
- Click “Upload Workbook”
- Wait for Confirmation of Successful Upload
- If unsuccessful, view error report to see where issues occurred. Correct and resubmit
• Error reports will tell you on which page of your workbook and in which row an error occurred.

• Error message will tell you what the actual error with the data was.

• Error reports may be downloaded (useful for fixing large numbers of errors, as EmployRI will time out).
• All student data is stored and analyzed on a secure server and all personal data is encrypted. All Department computers are password protected.

• Access to individual data is limited to staff who have a business need to access such data (i.e. preparing ETP reports) and have signed Confidentiality Agreements in which they agree to follow strict data security procedures.

• Individual data reported to the Department is not considered public information and is exempt from public disclosure law.
• Technical assistance will be made available on an ongoing basis to ETPs to help comply with this requirement

• Reports must be submitted quarterly

• Quarterly reports are cumulative program year-to-date. Example:
  • Q1: Bob – Started
  • Q2: Bob – Ended | Jeff – Started
  • Q3: Bob – Ended | Jeff – Ended | Sue – Started
  • Q4: Bob – Ended | Jeff – Ended | Sue - Ended
Corrective Actions and Sanctions
Corrective Actions and Sanctions

- ETP Performance Reporting and the integrity of participant information is subject to monitoring
- DLT is here to help, and Technical Assistance is available
- Requirement became effective July 1, 2021 and is already in place [Time Sensitive Request]
  - Q1 [QE 9/30] - Data would have been due NOW, but DLT is not mandating it as technical assistance was not yet provided
  - Q2 [QE 12/31] – DLT will work closely with ETPs and provide moderate flexibility to work out the kinks
  - Q3 [QE 3/30] – DLT will work closely with ETPs and provide minor flexibility to resolve any continuing issues
  - Q4 [QE 6/30] – DLT expects that ETPs regularly meet the performance reporting requirement
- Initial Failure to meet this requirement will result in Corrective Action
- Continued Failure to meet this requirement will result in removal from the Eligible Training Provider List
### CURRENT PROGRAM YEAR 2021-2022

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<td>Q3</td>
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<td>Q4</td>
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### FUTURE PROGRAM YEARS

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Questions?
For program funding details in compliance with the Stevens Amendment, please visit https://dlt.ri.gov/wds/program-funding/