

H-1B PIRL 2025 FREQUENTLY ASKED QUESTIONS - REVISED

This document was updated in January 2026 following the [Performance Reporting Orientation 2026: New H-1B Reporting Requirements for Nursing Expansion Grants](#) webinar to incorporate questions asked by grantees.

WHAT IS H-1B PIRL 2025?

H-1B PIRL 2025 is an Excel file that contains the new (i.e., updated) version of the participant performance reporting instructions for H-1B grants. The file contains an updated Participant Individual Record Layout (PIRL) schema for H-1B grants, revised validation rules for how those data elements can be used, and a revised Quarterly Performance Report (QPR) that will change how participants are counted in some outcomes. It can be found on the [H-1B Skills Training Community Performance Page](#).

WHEN IS THE SHIFT TO PIRL 2025 OCCURRING?

H-1B PIRL 2025 will go into effect for Nursing Expansion grantees on April 1, 2026. Grantees will be **required** to use it to report on participants for the March 31, 2026 report, which is due on May 15, 2026.

WHY IS THIS CHANGE HAPPENING?

Every three years, the DOL-Only PIRL, which includes the program-specific [H-1B PIRL 2025](#), goes through a review process with the Office of Management and Budget (OMB) to renew the approval to use it for collecting grant participant information. As part of the process, the Employment and Training Administration (ETA) makes PIRL revisions to reflect new priorities for data collection, as well as to correct reporting instructions that will increase data accuracy.

WHAT'S CHANGING?

The new [H-1B PIRL 2025](#) streamlines your reporting by reducing the number of data elements from 90 to 70. Some outcome and data element definitions will also be more intuitive. To align with the changes and better reflect H-1B policies, new employment outcomes have been added to the QPR and two outcomes have been deleted. Logic rules and aggregation rules have been revised to support the new outcomes and revised definitions. Additionally, the new PIRL also contains some revisions to data element names, instructions, and code values and QPR outcome names.

For a complete list of the changes, please see the **Summary of Changes to the Participant Individual Record Layout (PIRL) 2025** reference resource, which is located on [Nursing Expansion Community](#).

DOES THIS CHANGE IMPACT ME? HOW WILL THESE CHANGES IMPACT MY GRANT?

The transition to PIRL 2025 affects how every grantee will collect, track, and report participant data in three primary ways:

- **New Data File Format:** The addition and deletion of data elements from the PIRL schema will require you to change the structure of your data file by adding and removing the appropriate columns.
- **Data Shifting/ Re-Coding:** Changes in the definitions of the employment outcomes require you to move data previously reported in some data elements to others so your participants show up

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correctly on the QPR. In some cases, you may need to shift data that was reported in a deleted data element to a different data element that will remain in the schema.

- **Tracking Employment Outcomes:** Since the employment outcomes and the data elements that are used to aggregate them are changing, your employment tracking processes will need to be updated to collect information about employment from your participants to align with the changes.

Note that there are many changes that will have no impact or a minimal impact on your reporting, as nothing about how you collect, track, or report data is impacted. Examples include text clarifications or the addition of code values that are not applicable to H-1B.

HOW ARE THE EMPLOYMENT OUTCOMES CHANGING?

Four major changes have been made to the way ETA will aggregate and review employment outcomes on the QPR for H-1B grants:

- **Definition of Employment Achievement for Underemployed Participants:** Underemployed participants who achieve an employment outcome will now show up with incumbent workers as “advancing to a new position” instead of “entering employment” with unemployed participants.
- **Separation of Reporting Program Completion and Entering Employment:** Unemployed participants who enter employment can now be reported as soon as it happens instead of waiting for program completion. The QPR will now show the employment outcomes of both program completers and non-completers. Note that your outcome target will still only include the number who both enter employment and complete the program.
- **Elimination of Retention Outcome:** As job retention is no longer tracked for H-1B grantees as a program outcome, this outcome has been eliminated from the QPR.
- **Removal of the Time Limit for Advancing to a New Position:** The three-quarters-after-completion restriction on how long employed participants have to advance to a new position has been lifted. Employed participants who complete their programs can now be counted as advancing to a new position if they did so at any time after starting the program.

The new employment outcomes will require you to make some changes to how you are currently tracking and reporting information, but DOL will provide assistance to help you transition. Overall, these changes will make it easier for you to track and report some outcomes and demonstrate success on your QPR.

HOW CAN I PREPARE?

In January 2026, DOL hosted a PIRL 2025 Orientation Webinar to walk through the changes and answer your questions live. In addition, we encourage you to the **Summary of Changes to the Participant Individual Record Layout (PIRL) 2025** and the other additional resources available to help you with the transition on the [NE Transition to PIRL 2025 Community page](#) to get a sense of which changes will impact you the most. You may wish to focus on the redline [version](#) of [H-1B PIRL 2025](#), which highlights all the changes from the PIRL 2021.

IMPORTANT: [H-1B PIRL 2025](#) will not go into effect until April 1, 2026. For the quarter ending December 31, 2025 (due February 15, 2026), you will continue to use the process and PIRL version you have used since the

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start of your grant. If you decide to start making changes to your database or data file or data to accommodate [H-1B PIRL 2025](#), please save your changes as a new version under a different name. Please ensure you are not deleting any data or columns in your original data file.

CAN I SWITCH TO PIRL 2025 NOW?

No. The Workforce Integrated Performance System developers are making coding changes and coordinating user testing to prepare for PIRL 2025; however, those changes will not be live until April 1, 2026. If you try to submit a data file using [H-1B PIRL 2025](#) prior to the time, WIPS will not recognize it as a valid file format and it will be rejected.

DO I NEED TO COLLECT AND REPORT NEWLY ADDED DATA ELEMENTS OR NEWLY REQUIRED EMPLOYMENT INFORMATION FROM PAST AND CURRENT PARTICIPANTS? *

[H-1B PIRL 2025](#) includes three new data elements: **PIRL 216 Middle Eastern/North African**, **PIRL 3011 Sexual Orientation**, and **PIRL 3004 Individualized Services Provided Virtua/Online**. Additionally, the time limit to achieve the employment outcome “Advanced to a New Position” has been eliminated (see “[HOW ARE THE EMPLOYMENT OUTCOMES CHANGING?](#)”), which impacts your reporting in **PIRL 2120 Advanced to a New Position**. These changes require you to collect new or additional information about participants.

We understand that demographic information is typically collected during the intake process and collecting it from participants that have already completed intake or have exited the program may be burdensome for program staff. In general, you should report as much information as you have or can reasonably collect for all of your participants, including past and current participants. This is especially important for employment information, since you provided a target that includes the number of participants who advance to a new position.

In cases where this information is not available or cannot be obtained, you may need to include an applicable code value to avoid data file errors. Please see below for guidance about how to handle each change for current or past participants.

PIRL 216 and PIRL 3011

PIRL 216 Middle Eastern/North African: If you have this information about current or past participants, then report it. You do not need to follow up with past participants to collect demographic information; however, we encourage you to make an effort to collect this information from participants who are still in training to be compliant with reporting requirements. This data element **cannot be left blank**, so you must enter a code value for all participants (past and current) in your data file. If you do not have this information for current or past participants, you can enter code value **9 = Did not self-identify**. Moving forward, this information should be collected during the intake process and reported.

PIRL 3011 Sexual Orientation: This data element is not mandatory and can be left blank. If you have this information about current or past participants, then report it. If you do not have this information for current or past participants, you can leave it blank or enter code value **9 = Participant did not self-identify**. Moving forward, this information should be collected during the intake process and reported.

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PIRL 3004 Individualized Services Provided Virtual/Online

This data asks you to report whether services provided by your grant (*other than training services*) were provided online, in-person, or both. Since grantees report information about three types of services in their data files, we anticipate that the method of service delivery is available for all grant participants. Although this data element can be left blank, we encourage you to report it for all of your participants (including past and current participants) to help provide DOL with a more detailed picture of service delivery.

PIRL 2120 Advanced to a New Position

H-1B PIRL 2021 limited advancement to a new position to three quarters after completion only, which was reported in PIRL 2120/2122/2124 Advanced to a New Position in the 1st, 2nd, 3rd Quarter After Completion. This limitation has been eliminated in [H-1B PIRL 2025](#); you are now required to follow up with participants who were employed when they became participants for the duration of the period of performance until they advance to a new position. This advancement in employment is reported in PIRL 2120. Past participants who completed their programs more than three quarters ago can now be counted in PIRL 2120 if they have advanced to a new position. We strongly encourage you to include them in your ongoing follow-up outreach processes to help you meet your grant employment target and demonstrate your grant's positive impact on your community. You should plan to follow up with current (and future) participants after they complete the program to learn whether they have advanced to a new position. Review the definition of PIRL 2120 in the [H-1B PIRL 2025](#) schema to learn what counts as "advancement."

FOR PIRL 3004 INDIVIDUALIZED SERVICES PROVIDED VIRTUAL/ONLINE, DO WE NEED TO CAPTURE TYPE OF DELIVERY FOR ALL STAFF ASSISTED SERVICES? (E.G., BASIC CAREER SERVICES, INDIVIDUALIZED CAREER SERVICES, SUPPORTIVE SERVICES, FOLLOW-UP SERVICES.) *

There are no changes to what constitute grant-funded individualized services. There are three types of allowable grant-funded activities, *other than training services*, for the Nursing Expansion Grant: **assessment services, case management services, and supportive services**. Moving forward, you must capture the method of delivery (i.e., virtual, in-person, combination) for these three service types and report them in PIRL 3004.

Note that you will report the method of delivery for individualized services overall using PIRL 3004; you will not report this information for each of the three types separately. If the method of delivery for all services of any of the three types is either virtual or in-person, report the corresponding code value for virtual or in-person in the data file, as applicable. If additional services are provided at a later time using a different method of delivery, you should update the code value to reflect that a combination of methods have been used.

Review the definitions provided in the [Nursing Expansion Performance Reporting Handbook](#) for each of these three service types to determine if they apply to your program activities. Activities or participant contact that does not meet the definition of one of these three types of services are not captured in your data file.

ARE OUTCOMES #5 (NUMBER OF UNEMPLOYED PARTICIPANTS WHO COMPLETED A TRAINING PROGRAM AND ENTERED UNSUBSIDIZED EMPLOYMENT) AND OUTCOME #6 (NUMBER OF UNDEREMPLOYED AND INCUMBENT WORKER PARTICIPANTS WHO COMPLETED A TRAINING PROGRAM AND ADVANCED IN EMPLOYMENT) NOW COUNTED COLLECTIVELY? FOR EXAMPLE, IF WE HAVE A GOAL OF 100 FOR OUTCOME #5 AND A GOAL OF 20 FOR OUTCOME #6 - OUR COLLECTIVE GOAL WILL NOW BE 120 AND WE WILL NOT BE EVALUATED FOR THE PROGRESS OF THESE OUTCOMES SEPARATELY? *

Since grantees began providing participant data in the fall of 2024, DOL has always assessed the impact of the program on participant employment using a singular outcome: ***Total number of participants who completed education/job training program activities and either entered unsubsidized employment or advanced into a new position***. This is not a change with H-1B PIRL 2025.

Track 1 grantees provided a target for this outcome in their applications (Outcome #6) and Track 2 grantees provided targets for this outcome in a disaggregated format: *Total number of participants who completed education/job training program activities and entered unsubsidized employment* (Outcome #5) and *Total number of participants who completed education/job training program activities and advanced into a new position* (Outcome #6). A decision was made early in the grant program's period of performance to align the employment outcomes of the two tracks. For Track 2 grantees, we use a combined total target that consists of the sum of the individual targets provided for Outcomes #5 and #6. Each quarter, you receive a scorecard that presents your total target for employment outcomes and progress toward meeting that target using the sum of the totals on the QPR for the two associated employment outcomes.

With the transition to [H-1B PIRL 2025](#), the *reporting* of employment outcomes for underemployed participants is changing (they will now be counted with incumbent workers instead of with unemployed participants), but because employment outcomes were already being evaluated as a combined total, there is no impact to your performance targets.

To use the example provided, if a grant set a performance target of 100 unemployed and underemployed participants entering employment and 20 incumbent workers advancing in employment after program completion, the combined total target is 120. Now that underemployed participants will be counted on the QPR as advancing to a new position instead of entering employment, the total number of participants who entered employment may decrease and the number of participants who advanced to a new position may increase. However, DOL has already been assessing progress against a target of 120 post-program employment outcomes and this combined total assessment will continue with the use of [H-1B PIRL 2025](#). The change to how underemployed participants are aggregated on the QPR has no impact on showing the progress you have made toward meeting your combined total employment target.

For more information about how employment outcomes are assessed, please review the information and resources located on the Nursing Expansion Community [Quarterly Performance Outcomes page](#).

DO PIRL 2908 AND 2911 NEED TO BE INCLUDED IN OUR DATA FILE, EVEN IF WE DON'T HAVE A REGISTERED APPRENTICESHIP PROGRAM? *

Every data element listed in the [H-1B PIRL 2025](#) schema must be included in the data file uploaded into WIPS, this includes data elements 2908 and 2911. Even if the data element is not used by your program or is left blank, the column must be retained in the data file. H-1B PIRL 2025 contains 70 data elements, which means all data files uploaded into WIPS must contain 70 columns, even if some are blank.

DO WE NEED TO REVISE EXISTING DATA IN PIRL 1813 FOR ALL PARTICIPANTS WHERE DATA HAS BEEN INPUT FOR THOSE WHO HAVE ONLY COMPLETED TRAINING (OUR PREVIOUS UNDERSTANDING OF THE DEFINITION) VS COMPLETING ALL ELEMENTS OF OUR PROGRAM (I.E., TRAINING COMPLETION, NCLEX, AND EMPLOYMENT)? *

The change in how **PIRL 1813 Date Completed, During Program Participation, an Education or Training Program Leading to a Recognized Credential or Employment** is reported in [H-1B PIRL 2025](#) does not include an increased requirement for *successful* completion.

In the previous version of the H-1B PIRL, PIRL 1813 was used to indicate when a participant *successfully* completed all training activities planned for them during the grant (i.e., a participant earned all of the formal award units needed towards the degree, certificate, or certification that was the goal of their enrollment or have met another program-specific definition of successful completion).

With the transition to [H-1B PIRL 2025](#), PIRL 1813 will now be used to indicate when a participant is no longer in a grant-funded training. In other words, a date will be recorded in PIRL 1813 when:

- The participant successfully completed the training program (i.e., A participant earned all of the formal award units needed towards the degree, certificate, or certification that was the goal of their enrollment or have met another program-specific definition of successful completion.); or
- The participant withdrew from or dropped out of the training program.

Licensure or certification results or employment outcomes are reported in other data elements, but do not impact when or how PIRL 1813 is reported.

WHERE CAN I GO FOR MORE INFORMATION?

The [Nursing Expansion Community PIRL 2025](#) collects all of the guidance and technical assistance that we are releasing in one place. It will be updated regularly as new and revised resources are released. Please bookmark the page and share the link with your team.

* Indicates this question is a new addition to the FAQ that was asked by a grantee during the [Performance Reporting Orientation 2026: New H-1B Reporting Requirements for Nursing Expansion Grants](#) webinar.