



H-1B

Building Pathways Grant Program

Participant Data Collection and Tracking Toolkit

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About this Guide

The Department of Labor Employment and Training Administration (DOL/ETA) requires DOL Building Pathways grantees to report a series of data points on participants who receive a service or training paid for with grant funds in a Quarterly Performance Report (QPR). These reports are used to assess progress toward targets submitted in the Statement of Work (SOW) for program-specific outcome measures.

We want to help ensure that managing your participant data in preparation for submitting it to the Department is as thorough and seamless as possible with minimal burden. Ultimately, we want your data management efforts to reflect the great work and impact your program is having on the workforce.

This guide is designed to support you in your efforts to collect and track participant data throughout the grant life cycle to ensure you can report accurate information about participants in the QPR. It includes best practices for successfully developing effective data collection and tracking processes and incorporating them into your overall grant implementation.

This technical assistance tool is designed specifically for DOL Building Pathways grant staff such as data entry and IT personnel, case managers, program managers, and directors, as well as training and supportive service partners, who are responsible for developing data management policies and procedures, tracking participant records, creating grantee data files, uploading data files, and submitting quarterly progress reports.

Suggested Steps for Successful Data Collection and Tracking

Successful grant reporting doesn't just happen. Before you can successfully report on your grant, you must successfully collect and track the information you are required to report. Doing that takes careful planning and forethought.

Too late, some grantees realize that they missed opportunities to capture information that they needed, or they start to recognize that there are so many moving pieces that they can't get everything they need to report accurately and on time. Though their programs are performing well, it is not reflected in their data, and they find that they spend a lot of their time tracking down information that they may never get or training partners or staff on brand new policies that may be ineffective.

The best time to start thinking about participant reporting is before you start enrolling any participants. You can establish procedures ahead of time that will allow you to collect the information from participants and continue to track them throughout your program and beyond.

Below are some suggested steps you can use during your grant start-up phase to implement a system that can help set your grant up for successfully collecting and tracking participant information.

1. Understand the quarterly reporting requirements.
2. Understand what information to collect.
3. Understand the timing of when information should be collected.
4. Establish staff roles and responsibilities.
5. Develop an internal case management system.
6. Establish intake procedures that build in participant data collection.
7. Establish a schedule to regularly check in with participants.
8. Establish methods to follow up with your participants after they leave your program.
9. Establish a process for regularly collecting information from grant partners.
10. Develop policies for documenting, validating, and securing data.
11. Document your established procedures so new staff can follow them.

This toolkit contains strategies and tips to help you implement each of these steps. If participants have already started enrolling in your programs, you can use these tips to develop new procedures and refine the ones you have in place to continue to improve your data collection and tracking processes.

Step 1: Understand the Quarterly Reporting Requirements

As outlined in the DOL Building Pathways Funding Opportunity Announcement (FOA) and your grant award, grantees are required to collect and report participant level data on all individuals served and/or trained using grant funds and to document the implementation and progress specified in their grant's SOW to comply with the reporting and recordkeeping requirements.

Grantees are required to report this information to DOL/ETA through the *Workforce Integrated Performance System* (WIPS), DOL's web-based reporting system. This information is submitted quarterly in two reports: (1) a Quarterly Performance Report (QPR) generated through a comma-separated values (csv) data *file* upload of all participants served by the grant to date (cumulative, from the start of the grant program); and (2) a Quarterly Narrative Report (QNR) containing updates on the implementation and progress specified in each grant's SOW. Both the QPR and QNR are OMB-approved documents for quarterly performance reporting.

This toolkit is focused on the requirements for the QPR, for which you will need to collect and track data on participants during and after they are in one of your programs.

Quarterly Reporting Deadlines

Quarter End Date	Progress Report Due Date	Report Activities Occurring Between
March 31	May 15	January 1 – March 31
June 30	August 15	April 1 – June 30
September 30	November 15	July 1 – September 30
December 31	February 15	October 1 – December 31

Step 2: Understand What Information to Collect

Data Elements

The .csv data files that grantees submit each quarter contain numerical values that provide information about participant activity that corresponds with H-1B data elements (DE). H-1B DEs are data points, or unique pieces of information, about individuals who receive grant-funded services or training that, when reported, enable ETA to assess the performance of federal investments for various training and employment programs.

The H-1B DEs are listed and defined in the complete *H-1B Participant Individual Records Layout (PIRL) 2024* and the resource list *H-1B PIRL 2024 Data Elements for Building Pathways grants*. Note that as of December 2023, the document *H-1B Participant Individual Records Layout (PIRL) 2024* is not yet available and will be provided later.

The approximately 70 DEs can be grouped into five key categories: *Individual Information*, *Program Participation*, *Services and Activities*, *Program Outcomes*, and *Employment Outcomes*. Grantees are required to collect and report all the DEs specified in these categories for H-1B grant performance reporting purposes.

RESOURCE ALERT!

**H-1B PIRL 2024 Data Elements for
Building Pathways grants**

H-1B PIRL Data Elements Sample

DATA ELEMENT NO.	DATA ELEMENT NAME	DATA TYPE/ FIELD LENGTH	DATA ELEMENT DEFINITIONS/INSTRUCTIONS	CODE VALUE	H-1B PROGRAM REQUIREMENTS ¹
1307	Training Completed #1	IN 1	Record 1 if the participant completed approved training Record 0 if the participant did not complete training (withdrew) Leave blank if the participant did not receive a first training or this data element does not apply to the participant.	1 = Yes 0 = No (withdrew)	R [required]
1308	Date Completed or Withdrew from Training #1	DT 8	Record the date when the participant completed training or withdrew permanently from training. If multiple training services were recorded, record the most recent date on which the participant completed training. Leave blank if the participant did not receive a first training or this data element does not apply to the participant.	YYYYMMDD	R [required]

Each data element has a:

- Data element number (identifier)
- Data element name (the information being collected)
- Data type and character length (the type of information being collected and how many characters can be provided for that data element)
- Data definition and/or instruction (a description of the information being collection)
- Set of code values (the possible choices for reporting that information)

For example, DE 1307 is for reporting whether a participant has completed Training #1. Only a number (integer) can be reported here, and it can only be one digit. A “1” means “Yes,” the participant completed the training, and “0” or “No” means that they withdrew from the training. If the data element doesn’t apply because they haven’t received a training or they’re still enrolled or some other reason, then the data element would be left blank.

When available, please review the **H-1B PIRL 2024** or the **H-1B PIRL 2024 Data Elements for Building Pathways Grants** file to understand what information to collect to report on all the data elements and correct code values for your participants. Having a clear understanding of what data is required for reporting completely and accurately will help you develop policies that determine who will collect it and when.

Step 3: Understand the Timing of When Information Should Be Collected

The required H-1B DEs can be grouped into five general categories:

- **Individual Information:** participant identifying information and demographics, such as birth date, racial or ethnic group, and disability, employment status, social security number, and grant program;
- **Program Participation:** program participation data, which includes the date of program entry, dates of first receiving services, and program exit;
- **Services and Activities:** dates and types of training services that participants receive while in the program, including work experiences;
- **Program Outcomes Information:** dates of program completion and the date and type of credentials received; and
- **Employment Outcomes:** dates of entry into new employment or advancement to a new position.

Thinking through the best times in a participant's journey through your training program to collect all the required information is an important step in ensuring all the required data elements can be reported and no key information slips through the cracks.

Some of the information may be collected at key points before an opportunity is lost or more difficult to come by again. Other information may be collected from participants at multiple points during program participation, however, it may be easier and lead to better results to collect it at some points over others. Not collecting data at the right time or at all can lead to missing out on collecting other information later. Below is a table of suggested points in time to collect information from participants for each category.

Key Program Participation Points for Data Collection

Required Information	Point in Program Participation to Collect
■ Individual Information ○ Birth date ○ Social security number ○ Demographic information ○ Employment Status	✓ Eligibility determination ✓ Intake
■ Program Participation ○ Dates of entry, receipt of services, and exit	✓ Intake ✓ Quarterly review of data (data validation process) to determine if services are still being received
■ Services and Activities ○ Dates and types of training services	✓ Intake ✓ Orientation
■ Program Outcomes ○ Dates of completion ○ Credentials	✓ Program training or semester end ✓ Ceremonies or recognition for conferring credentials
■ Employment outcomes ○ Entering employment or advancing in employment	✓ Regular meetings or contact with employer partners ✓ Exit or follow-up surveys post-completion or post-exit ✓ Continued contact with participants through established follow up procedures

Step 4: Establish Staff Roles and Responsibilities

An essential part of efficient grants management is to establish roles and responsibilities for your staff. This includes the responsibility to collect information from participants that will later be reported to DOL.

This chart provides recommendations on how to establish staff roles and responsibilities for the tasks that are crucial to capturing participant information and activities.

Data Collection, Tracking, and Reporting: Staff Roles and Responsibilities

Staff Role	Action
■ Case Manager, Program Coordinators, Training Partners, Service Providers, Employers	✓ Collect participant data and data from partners ✓ Track participant data using an internal case management system ✓ Document and validate data
■ Authorized Representative, Program Director	✓ Secure Personally Identifiable Information
■ Program Director or Manager, Data Managers, IT Staff	✓ Generate and upload data files into WIPS ✓ Resolve data file errors and troubleshoot issues in WIPS
■ Authorized Representative (or a second individual designated by the Authorized Representative to have WIPS certification capabilities)	✓ Certify Quarterly Performance Report (QPR) form

Step 5: Develop an Internal Case Management System

It is essential to maintain case files for each participant using your internal system. To track participant progress over time, grantees should have an internal case management system that staff can use to record participant data for the program in one place and make changes to it to reflect new information throughout the grant life cycle.

An existing case management system may be sufficient; however, grantees should ensure it has a method for tracking all data elements upon intake and throughout the period a participant is provided grant-funded services. In addition, the system should allow staff to generate an output file to upload to WIPS in the required .csv format. Grantees may elect to use grant funds to purchase software or pay an Information Technology system developer to build a case management system. If funds have not been allocated for this, please speak with your Federal Project Officer (FPO) about how to modify your budget to build in this cost.

Note that WIPS is not a case management system, as data is only entered into it quarterly using one file. It cannot be used to track participant progress on an ongoing basis.

HOT TIPS

- Make sure your system includes EVERY H-1B required data element as a data field entry for each participant record.
- Make sure you have a record-keeping system for documenting all the data elements you enter into WIPS.
- A participant record should have a corresponding code value for most data elements. In some cases, leaving the data field blank is an option if the data element does not apply to the participant.
- Develop a process that each of your partners can follow to help ensure they are collecting information in the same way. Provide them with a template and request that they use that format to submit participant data to you.

Step 6: Establish Intake Procedures that Build in Participant Data Collection

Establishing Participant Eligibility

Gathering the information needed to inform the H-1B data elements should be integrated into every aspect of your on-boarding process (including eligibility assessment, intake, and orientation).

Before recording participant data on an individual, first establish whether an individual is eligible for your H-1B training program and activities. As part of your process to determine participant eligibility, some sample questions might include:

- Is the individual eligible based on the DOL Building Pathways FOA?
- Is the individual eligible based on SOW that was submitted to DOL?

For participants deemed eligible to participate, the birth date you already collected and used to determine if a participant was old enough to participate in H-1B training programs can be included in the internal case management system to later report on the corresponding birth date DE for those who are deemed eligible and receive services or training.

Best Practice: 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 help ensure consistency and accuracy.

Participant Intake and Intake Forms

As an individual is determined eligible for your specific program activities, you will need an intake process for assessing and collecting information from this individual. An intake process could entail processes such as:

- Completing intake forms
- Conducting an intake interview
- Hosting intake sessions and/or other orientation activities

Guidance provided by ETA on H-1B grants performance reporting can be used by grantees to explain the need for collecting participant information. Being transparent and providing participants an explanation for why the information is being collected may increase the likelihood that you will get this information for reporting purposes.

Your program's participant intake and/or enrollment form(s) should include questions that help inform all relevant initial data required for H-1B performance reporting; this might include date of entry into the program, age of the participant, employment status at program entry, or other relevant information.

Many of the definitions for the H-1B data elements can be used as questions to develop your intake and enrollment forms. When the language from data elements is transferred to questions on the form, this can ensure that they are 1) being asked in a way that explains the purpose, and 2) consistent with how you will need to report outcomes.

Converting Data Elements into Enrollment Questions

The table below provides an example of how DEs could be converted into questions to include on an intake/enrollment form.

Data Elements Language as Converted into Questions

DE #	Data Elemen	Description	Sample Intake Form Question
210	Ethnicity Hispanic/Latino	Record 1 if the participant indicates that he/she is a person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture in origin, regardless of race. Record 0 if the participant indicates that he/she does not meet any of these conditions. Record 9 if the participant did not self-identify his/her ethnicity.	Question One: Do you self-identify as a person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture in origin, regardless of race? YES/NO

211	American Indian or Alaska Native	Record 1 if the participant indicates that he/she is a member of an Indian tribe, band, nation, or other organized group or community, including any Alaska Native village or regional or village corporation as defined in or established pursuant to the Alaska Native Claims Settlement Act (85 Stat. 688) [43 U.S.C. 1601 et seq.], which is recognized as eligible for the special programs and services provided by the United States to Indians because of their status as Indians. Record 0 if the participant indicates that he/she does not meet any of these conditions. Record 9 if the participant did not self-identify his/her race.	Question Two: Do you self-identify as a person having origins in any of the original peoples of North America and South America (including Central America), and who maintains cultural identification through tribal affiliation or community recognition? YES/NO
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Sample Participant Intake Form

H-1B Grant Program

Grant Name: _____ Case Manager: _____

PARTICIPANT CONTACT INFORMATION

First Name: _____

Middle Name: _____ Last Name: _____

Address: _____

Phone Number: _____ Email Address: _____

PARTICIPANT DEMOGRAPHICS

* Social Security Number: _____

Date of Birth: _____ Gender: _____ (Male) _____ (Female)

Do you self-identify as a person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture in origin, regardless of race? YES/NO

Do you self-identify as a person having origins in any of the original peoples of North America and South America (including Central America), and who maintains cultural identification through tribal affiliation or community recognition? YES/NO

HOT TIP

The intake process can also be electronic. Some advantages to self-registration are that they can eliminate steps in the case management process and make securing data easier. However, if the software is not user-friendly, participants may skip the registration process altogether.

If you decide to go the electronic route, ensure that you provide training and support on how to use the software and build in other opportunities up-front to establish a relationship with the participant so you can explain why the information you're collecting from them is needed.

Collecting Social Security Numbers

All H-1B grantees are asked to collect Social Security Numbers (SSNs) for all participants served with grant funds and report outcomes to ETA. 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.

Grantees have reported that employer partners and training providers can be sensitive to the collection of SSNs and forms that included questions identifying race and/or ethnicity. Participant intake forms should include disclaimer language around the collection of SSNs.

Sample 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 under the H-1B grants 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 H-1B grant received by Sample Community College 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 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.

ETA, on behalf of the grantees, will work with its state partners to match participant 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. ETA calculates a set of **Workforce Innovation and Opportunity Act Indicators of Performance** that include entry into employment, employment retention, and median earnings.

Step 7: Establish a Schedule to Regularly Check-in with Participants

The intake process is only the beginning. Keeping in touch with participants to gather the information you need to report all of the required data to DOL is an ongoing process that will continue until your grant ends.

First, you should be thinking about how you will go about collecting the information. There are several methods that can be used to collect participant feedback such as phone calls, meetings, or surveys. It is important to determine the best method of gathering feedback based on the program. Be willing to pivot to a new method if one doesn't seem to be working.

Second, schedule check-ins at regular intervals throughout the program to collect the needed information. Depending on the method you chose or the program length (or other factors), you may decide to check in weekly, quarterly, monthly, once a semester, or some other interval. Assess the interval you chose to see if it's working.

You may experience challenges attempting to follow-up with participants, but there are many ways to minimize those challenges if you've set the stage for collecting it when they've walked in the door. Setting expectations with participants from the beginning that you will be in regular contact with them throughout their training and after they complete the program leads to a greater likelihood that you will be able to get the information you need.

HOT TIPS

Here are some tips to incorporate into your tracking strategy while your participants are enrolled in your training programs:

- Send calendar invitations to your participants to build in time for them to complete surveys to highlight their importance.
- Bundle the check-ins with additional programmatic education or services to entice participation.
- Test out different language in surveys to see what gets the most responses.
- Give participants the opportunity to provide multiple phone numbers and/or email addresses at intake to there are already multiple methods of contact throughout.
- At every check-in, give participants the opportunity to update their contact information.
- Make check-ins short and sweet.

Step 8: Establish Methods to Follow-Up with Your Participants After They Leave Your Program

Following up with participants once they leave your training program is crucial. Meeting the reporting requirement for your grant includes reporting changes in employment for participants who complete your training programs. To report this information, you will need to find ways to gather employment information on these participants, although you may no longer be in contact with them.

It may be worthwhile to re-frame the participant-program relationship and develop a program design that incorporates indefinite contact with your grant-funded participants. As part of that program design,

establish a follow-up timeline and inform participants of that timeline during the enrollment process. A seamless and powerful way to make this follow-up contact a part of the program design is to integrate an incentive policy. The DOL Building Pathways to Infrastructure Jobs FOA allows grantees to use grant funds to provide incentives for the purpose of collecting this information:

“DOL Building Pathways to Infrastructure Jobs grantees may use up to 1.5 percent of grant funds for the provision of gift cards or other types of incentive payments to participants for providing information on grant outcomes (such as credential attainment or employment status) after they complete their training program, for the purposes of accurately reporting performance outcomes to the Department. Grantees are prohibited from utilizing grant funds to provide incentive payments for any other purpose. These incentive payments must be tied to the goals of the grant. Grantees must have policies and procedures in place governing the awarding of incentive payments to participants and the incentives provided under the grant must comply with these organizational policies.” (p. 65).

An incentive policy that helps maintain a connection with the participants can assist grantees with the collection of this information.

Some grantees have challenges with resource constraints. Limited resources can impact the frequency and effectiveness of follow-up activities. If you need to talk to your FPO about a grant modification.

HOT TIPS

All the strategies from the “Hot Tips” in Step 7 for tracking participants while they are still in training can also be successful for following up with them after they leave your program. In addition, don’t be afraid to try some of these additional strategies shared by H-1B grantees over the years:

- Using incentives to pay for specific things participants need for their jobs, such as exam fees, scrubs, tools, or other job-related fees or equipment.
- Mine social media websites like LinkedIn and Facebook to search for participants who have been difficult to reach. You can even use LinkedIn in some cases to determine whether the participant has changed employers.
- Hire a job developer whose job it is to develop and refine strategies to successfully reach out to employers and participants to gather this information.
- Schedule group follow-up activities that offer value.
- Send calendar invitations to your participants to build in time for them to complete surveys to highlight their importance.
- Conduct qualitative interviews to gather information that participants don’t want to share on a survey.
- Use automated texting with simple, leading questions related to the current employment status. *Ex. Are you still working at [Name of Company] as a [job position]?*
- Establish Memoranda of Understanding with employer partners to provide information on participants about changes in their employment.

Step 9: Establish a Process for Regularly Collecting Information from Grant Partners

The method for collecting and tracking participant data will vary depending on the service providers for your grant. Although training providers, employers, workforce agencies, or other types of service providers won't access WIPS directly, it's important to establish a communication protocol between the Grant Program Manager/Director and those collecting data directly from participants. Participant-level data will always need to be stored and transmitted securely.

Note that it is the responsibility of the grantee or a designated grant partner to determine incumbent worker eligibility, and not the responsibility of the participating employer. Grantees or their designated grant partner must establish and document the eligibility of all participants, including incumbent worker participants.

HOT TIPS

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 be fully explained or understood.

- Add disclaimer language and guidance during the enrollment process so participants will understand why certain information is being collected on them.
- Ensure relevant dates that inform certain data elements are recorded.

Step 10: Develop Policies for Documenting, Validating and Securing Data

Documenting and Validating Data

Grantees should keep records to verify the data they report on participants. [TEGL 23-19 Change 2: Guidance for Validating Required Performance Data Submitted by Grant Recipients of U.S. Department of Labor \(DOL\) Workforce Programs](#) provides information on what documentation is sufficient to validate each data element. Grantees should speak with their FPOs about what information should be included in participant case files to ensure they are meeting documentation requirements.

In addition, grantees should review aggregated QPRs each quarter for accuracy to check ensure DOL's official data matches their own records and correct and make updates to the data file in subsequent quarters as needed.

Securing Personally Identifiable Information (PII)

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 may possess large quantities of PII for program participants. This information is generally found in personnel files, participant data sets, performance reports, program evaluations, grant and contract files, and other sources.

Grantees are required to protect PII when transmitting information but are also required to protect PII and sensitive information when collecting, storing, and/or disposing of it. Guidance regarding their handling and protection of PII is provided at [TEGL 39-11: Guidance on the Handling and Protection of Personally Identifiable Information \(PII\)](#).

Tip: Using an electronic case management system that enables you to upload all your documents can maintain security and decrease the need to store paper files.

Step 11: Document Data Collection and Tracking Procedures So New Staff Can Follow Them

Don't forget as you're establishing all these innovative procedures to institutionalize them by writing them down to ensure that they can be seamlessly carried out as new staff and partners come on board. In addition, here are some additional tips you may want to use:

- Create policy materials on data collection and tracking that are incorporated into your other grant policy documents and use them as training materials for your staff.
- Offer refreshers periodically to your staff on challenging data collection and tracking procedures.
- Regularly gather all the staff and partners who are involved with data collection and tracking processes to ensure that everyone involved has the same understanding of what data to collect and how to collect it.
- Review your procedures frequently to make sure your procedures are working and be willing to make changes when needed.