

## Frequently Asked Questions: Reporting Training in PIRL

### Training Phases

**Q1:** *What is a training phase? What are its component parts?*

**ANSWER:** The PIRL is designed to track up to 3 training phases (Training #1, Training #2, and Training #3). For the TAA Program, each of these training phases tracks 5 components:

1. Date Entered Training (PIRL 1302, 1309, 1314) tracks the start of each training phase.
2. Type of Training Service (PIRL 1303, 1310, 1315) tracks types of training, such as remedial, OJT, and Apprenticeship.
3. Occupational Skills Training Code (PIRL 1306, 1311, 1316) corresponds to the Occupational Goal through an O\*NET code.
4. Training Completed (PIRL 1307, 1312, 1317) tracks whether the participant *completed* their planned phase of training, or *withdrew* prior to that.
5. Date Completed, or Withdrew from, Training (PIRL 1308, 1313, 1318) tracks the actual date that the participant ended the training phase, regardless of whether the end date reflects the planned completion date or early withdrawal.

**Q2:** *Why is training broken into three phases? What should trigger creating a new training phase for reporting purposes?*

**ANSWER:** PIRL (and many of the individual reporting layouts that preceded it) contains up to 3 training phases. Multiple phases allow ETA to understand the variety of training types that combine for various training plans. Thus, a new training phase *must* be reported if Type of Training Service (PIRL 1303, 1310, 1315) changes.

A new training phase *must not* be added based solely on:

- Change in training vendor\*
- Academic calendar (e.g., Semester 1, Semester II)
- Change in funding stream\*
- Change in co-enrollment status\*

\* See section on *Co-enrollment and Funding Stream* for more context.

**Q3:** *If a participant has more than three training phases, which ones get documented?*

**ANSWER:** If a participant has more than three training phases, then:

- the first two trainings that occur in chronological order should be documented as training #1 and training #2.
- The last training that occurs in the participation should be documented in training #3.

For example, if a participant has four training phases then the training phases 1, 2, and 4 will be reported in the PIRL. This protocol for reporting training phases is important, as the duration of the participant training is calculated based on the Date Entered Training #1 (PIRL 1302) through the Date Completed, or Withdrew from, Training (1308, 1313, 1318) for the final reported training.

Therefore, it is especially important that Date Entered Training #1 (PIRL 1302) reflect the beginning of training participation, while Date Completed, or Withdrew from, Training #3 (PIRL 1318) should reflect the end of training participation, if three or more training phases apply. In the case of less than three training phases, the endpoint of tracking for training duration would be the Date Completed, or Withdrew from, Training #1 (PIRL 1308) or Date Completed, or Withdrew from, Training #2 (PIRL 1313), as appropriate.

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### Date Entered Training, Training Completed, and Date Completed, or Withdrew from, Training

**Q1:** *When is training first documented in PIRL reporting? Does training enrollment count for reporting purposes?*

**ANSWER:** Training dates are based on actual training participation, and not enrollment. In other words, the Date Entered Training (PIRL 1302, 1309, 1314) should align with the first date of training participation within the respective training phase. In addition, it follows that no other training-related elements may be reported in a training phase until the Date Entered Training (PIRL 1302, 1309, 1314) is reported.

**Q2:** *What event should document the last day of training of a training phase?*

**ANSWER:** If a participant completes a training phase in a manner that fulfills the training plan, the Date Completed, or Withdrew from, Training (PIRL 1308, 1313, 1318) should reflect that date on which all training completion requirements were met. Typically, this would be the date the final course/semester/quarter ends. It should not reflect the date that verification of completion was received, which often can be long after the training ends. If a participant withdraws, it would be the date that their withdrawal is effective. It should not reflect the date that verification of completion was received, which often can be long after the training ends.

**Q3:** *If the participant shows up for only the first/one day of training, is that reported? If so, how?*

**ANSWER:** If the participant attended at least one day of training, the training should be tracked in the PIRL. This would result in a coding value of "0 = No (Withdrew)" for Training Completed (PIRL 1307, 1312, 1317) and have a Date Completed, or Withdrew from, Training (PIRL 1308, 1313, 1318) that is the identical to the Date Entered Training (PIRL 1302, 1309, 1314).

**Q4:** *If a participant stops attending classes before the completion of their planned training phase, and does not return, what is entered for "Training Completed" and "Date Completed, or Withdrew from, Training"?*

**ANSWER:** The participant's Training Completed (PIRL 1307, 1312, 1317) would be "0=Withdrew" and their Date Completed, or Withdrew from, Training (PIRL 1308, 1313, 1318) would reflect the final date of actual training participation.

**Q5:** *If a participant skipped school for a period of time, did they withdraw?*

**ANSWER:** No, "0=withdrew" should only be reported in Training Completed (PIRL 1307, 1312, 1317) when the participant permanently discontinues the training phase. Missed classes, coursework, or failure to progress may ultimately be the basis for a decision to discontinue training, but it is not the date on which a withdrawal occurred, unless training is terminated.

**Q6:** *What is the documentation difference between a participant who stopped attending and one where the school terminated the training?*

**ANSWER:** None. The PIRL does not reflect the reason for withdrawal.

## Frequently Asked Questions: Reporting Training in PIRL

### Occupational Skills Training Code

**Q1:** *How is the Occupational Skills Training Code reported? Should it change if there is more than one phase of training?*

**ANSWER:** The Occupational Skills Training Code (PIRL 1306, 1311, 1316) must align with the participant's employment goal as stated in the training plan. Thus, if a training participation has two different Types of Training Service (PIRL 1303, 1310, 1315), such as Remedial and Occupational, but the overarching employment goal remains constant, then the same Occupational Skills Training Code should be reported for the two phases. For example, a training plan with the employment goal of Registered Nurse may include both Remedial and Occupational training phases. However, the Occupational Skills Training Code for both training phases should reflect that of an RN.

**Q2:** *Is it possible for an Occupational Skills Training Code to change?*

**ANSWER:** Yes. If the training plan is modified in such a way that alters the employment goal, then the Occupational Skills Training Code (PIRL 1306, 1311, 1316) should reflect that change. For example, if a participant training plan for an RN were changed to that of a Certified Nursing Assistant, then the associated Occupational Skills Training Code (PIRL 1306, 1311, 1316) should be updated to reflect the new goal.

**Q3:** *Is it possible to have training without an employment goal? What if a participant is assessed as only needing remedial training?*

**ANSWER:** All TAA approve training must have an Occupational Skills Training Code (PIRL 1306, 1311, 1316) that aligns with the employment goal of the training plan. TAA training participants who are assessed as needing remedial training "only" would also need a code that reflected the employment goal. As a result, the Occupational Skills Training Code could reflect occupational skills that the participant already possesses, but needs Remedial Training (e.g. ESL) to make the participant optimally marketable for employers.

## Frequently Asked Questions: Reporting Training in PIRL

### Date Individual Employment Plan Created (PIRL 1202)

**Q1:** How is Date Individual Employment Plan Created (PIRL 1202) reported if there is more than one IEP?

**ANSWER:** The IEP date should reflect the first date an IEP is created under any program.

**Q2:** *Can an Individual Employment Plan be created after training begins?*

**ANSWER:** Because the training plan must align with the employment goal, and the participant's individualized employment goal is predicated on an IEP, the Date Individual Employment Plan Created (PIRL 1202) should *always* pre-date the provision of training. For this reason, TAA has a measure that is designed to monitor the chronology of IEPs and Training participation to support effective program administration.

**Q3:** *We use the same form for the IEP and Training Approval, are these the same date?*

**ANSWER:** Almost never. The IEP date is the date on which the case manager and participant agreed on the individual employment plan. While training approvals could happen the same day, typically training will not be approved for a certain period of time after the plan is agreed upon.

### Training Enrollment

**Q1:** *What does it mean to be "enrolled in training" for the purposes of TRA and A/RTAA eligibility?*

**ANSWER:** For the purposes of TRA and A/RTAA eligibility, an individual is enrolled in training when the worker's application for training is approved by the State agency and the training institution has furnished written notice to the State agency that the worker has been accepted in the approved training program which is to begin within 30 calendar days of the date of such approval (20 CFR 617.11(a)(2)(vii)(D)(1)).

**Q2:** *What does it mean to be "enrolled in training" for the purposes of performance reporting?*

**ANSWER:** For the purposes of performance reporting, the date an individual is "enrolled in training" is the date that the participant is registered for classes with the training institution. There is not a requirement that the training will begin within 30 days or that it is a CSA approved training. In particular, this definition applies to Date Enrolled During Program Participation in an Education or Training Program Leading to a Recognized Postsecondary Credential or Employment (PIRL 1811) as well as Date Enrolled in Post Exit Education or Training Program Leading to a Recognized Postsecondary Credential (PIRL 1406). This definition aligns across all programs using the State Integrated Reporting Schema (SIRS).

**Q3:** *What does it mean to be "enrolled in training" for the purposes of TAA training service reporting?*

**ANSWER:** This element collects information on whether the participant is enrolled in training that will lead to an associate's degree. Because this element is designed to capture a category of training services that are provided, this element only needs to be marked as Yes (1) for participants who *received* TAA-funded training services that are expected to lead to an associate's degree. If an individual did not receive these services, this element would be marked as No (0).

## Frequently Asked Questions: Reporting Training in PIRL

### Training Expenditures: Quarterly (PIRL 1324) and Total (PIRL 1325)

**Q1:** What are the training expenditure elements? What types of expenditures are reported for these elements?

**ANSWER:** The TAA program requires the reporting of training expenditures for training phases funded by TAA. Those expenditures are tracked in PIRL 1324 (quarterly) and PIRL 1325 (total). These expenditures should be reported based on accrual accounting regardless of when billing, payments, or disbursements take place, and should meet the requirements of the definition provided in data element 11d of the [ETA-9130 \(M\) - Trade Adjustment Assistance Report](#). Quarterly training expenditures must never exceed total training expenditures.

**Q2:** *Can negative amounts be reported in Current Quarter Training Expenditures?*

**ANSWER:** It is possible that a training de-obligation occurs in a quarter that results in negative quarterly training expenditures. Negative amounts may be reported in PIRL for quarterly expenditure elements. To report a negative amount in Current Quarter Training Expenditures (1324), the minus sign should directly precede the number that reflects the associated dollar value. Note Total Training Expenditures (1325) field will not accept the minus sign.

**Q3:** *In addition to minus signs and numbers, what other characters may be included in Expenditures fields?*

**ANSWER:** As noted in the coding value, decimals are allowed to reflect dollars vs cents. However, commas and dollar signs must not be reported. For example, a \$1,200.00 de-obligation in Current Quarter Training Expenditures (1324) would be reported as -1200.00.

**Q4:** *Should training expenditures be reported when we pay the training provider?*

**ANSWER:** No. Training expenditures are based on accrual accounting. That is to say, the expenditure should be reported as soon as a cost is accrued.

**Q5:** *Should training expenditures include the cost of books and indirect costs?*

**ANSWER:** Yes. As indicated in the data element, indirect costs and the costs of goods and services should be included.

**Q6:** *The participant received both TAA funded training and non-TAA funded training, what should be included in the training expenditures?*

**ANSWER:** Only expenditure amounts allocated to TAA-provided grants should be included.

**Q7:** *The accrued training expenditure was reduced this quarter, how do we report that?*

**ANSWER:** Current Quarter Training Expenditures (1324) may be negative due to accrual adjustments. Please report the negative amount with a minus sign pre-fixing the number.

## Frequently Asked Questions: Reporting Training in PIRL

### Co-enrollment and Funding Streams

**Q1:** How do the TAA program's requirements differ from WIOA regarding Eligible Training Provider List (ETPL), and how does this difference impact reporting, if at all?

**ANSWER:** By statute, TAA cannot mandate use of the ETPL when selecting a training vendor. In addition, TAA does not require reporting of the Eligible Training Provider (PIRL 1301). However, in cases where there is co-enrollment between WIOA and Trade, these data elements may be collected. However, it is important to remember that a change in training provider does not create a new training phase, and it is possible that more than one Eligible Training Provider (PIRL 1301) will contribute to the same training phase. In these cases, the most recent eligible training provider should be reported, if applicable.

**Q2:** *If a training participation includes co-enrollment, whereby the participant begins training prior to TAA participation, and then continues training once TAA participation commences, how does that impact reporting on training? Should it trigger a new reporting phase?*

**ANSWER:** If a WIOA program participant begins training, and later becomes a participant in TAA, then the training must be assessed for compliance with the six criteria for TAA training approval. If, subject to this assessment:

- the TAA criteria are met, and
- the Type of Training Service (PIRL 1303, 1310, 1315) remains constant

Then the training phase should remain unbroken. In other words, as indicated in *Training Phases Q2*, co-enrollment factors should not trigger adding a new training phase.

**Q3:** *What if a participant is attending school that is not funded by the TAA program? Should that training be reported?*

**ANSWER:** All training should be reported for a given participation no matter what the funding source. For example, if a participant receives both WIOA-Adult funded training and TAA-funded training, both trainings should be reported to both WIOA-Adult and TAA.

## Frequently Asked Questions: Reporting Training in PIRL

### Distance Learning (PIRL 1328) and Part Time Learning (1329)

**Q1:** How should these training activities be reported?

**ANSWER:** These elements are not specific to a particular training phase, but should be reported “1 = Yes” if they occurred at any point during participation. Once one of these services is received, it should be reported as received throughout the duration of participant reporting.

**Q2:** *Part Time Training* says “in the report quarter,” shouldn’t it not be marked if they received part time training in a previous quarter?

**ANSWER:** This element description has an error, and been marked for a change/the language will be removed in the next version of the PIRL. Reporting Part Time Training (1329) as a fixed element ensures that we can track the percentage of training participants receiving part time training at exit.

**Q3:** *What mileage is considered distance training?*

**ANSWER:** Distance Learning (PIRL 1328) is based on remote-learning formats, such as those provided online. In person training is never considered to be Distance Learning (PIRL 1328).