

**Author Full Name :** Megan Scott**Received Date :** 05/13/2020 09:51 AM**Comments Received :**

Much of the demographic information requested on apprentices reflects the required information for WIOA program eligibility. However, not all apprentice participants in ETA grants will be eligible for WIOA programs and services. This information is not routinely collected by employers and it places a heavy burden on them to collect personal information of that nature. For example, Data element 806 asks if the participant is a single parent at program entry and specifies (WIOA) will grantees be required to obtain this information and enter it in the PIRL if the participant is an apprentice but not a WIOA participant even though the information is not pertinent to receiving funds from the grant?

Will elements with (WIOA) under the description only be required for apprentices who are both WIOA participants and an apprentice? \*See attachment for examples

Currently Employers are asked to enter information about apprentices into RAPIDs if they have a RAP in an OA state. This information is similar in nature to what is being requested in the PIRL. ie employers must enter information on the apprentice credential attainment. Will states now have to require employers to do double entry in RAPIDs and the state data collection system in order to meet the requirements for the PIRL? This could serve as a disincentive for employers to create registered apprenticeship programs.