



### III. PARTICIPANT-LEVEL PILLAR

#### Reporting Entity:

Postsecondary institutions report participant-level data to a state entity designated by the Governor. The state entity links participant records to administrative datasets (e.g., postsecondary unit record systems and UI wage records) for outcomes calculation and federal certification. The state may collect additional elements (e.g., demographics) to support specific policy objectives and also use the information for other education-to-employment research and analytics.

#### Reporting Timing:

- As census submission, aligned with other institution-to-state reporting timeframes: Identifiers, Enrollment, Financial Assistance, Residence (if applicable), Demographics (if applicable)
- As end-of-term submission, aligned with other institution-to-state reporting timeframes: Updates to Financial Assistance, Withdrawal, Completion
- Post-exit updates: As required to resolve audits, appeals, or data corrections in accordance with institution and state data governance policies

#### Record Structure:

- One record per participant per program enrollment
- Records must support longitudinal linkage across award years and outcomes periods

| Category    | Element                | Essential or Important / Regulatory or Other Source Reference                                                                                                                                                                                                                                                                                                                                                                               |
|-------------|------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Identifiers | Social Security Number | <b>Essential:</b> Institutions must submit data to the state necessary for it to calculate employment outcomes using administrative data (34 CFR 690.93(b)(2)). SSN is the most common identifier states use for matching to unemployment insurance (UI) wage records but may not be the only available method.                                                                                                                             |
|             | First Name             | <b>Essential:</b> First name, last name, and date of birth are key identifiers supporting employment outcomes analysis when SSNs are not available, or not valid, in state administrative datasets. Additionally, states must determine whether a credential is stackable and portable considering, if available, data showing whether students have obtained additional credentials through career pathways (34 CFR 690.93(b)(1)(iii)). To |
|             | Last Name              |                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|             | Date of Birth          |                                                                                                                                                                                                                                                                                                                                                                                                                                             |

| Category             | Element                           | Essential or Important / Regulatory or Other Source Reference                                                                                                                                                                                                                                                                                                                           |
|----------------------|-----------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                      |                                   | support this determination, states will need identifiers such as first name, last name, and date of birth to link to datasets that may have no, or limited, SSNs for linkage.                                                                                                                                                                                                           |
|                      | Unique Provider-issued Student ID | <i>Important:</i> The unique provider-issued student identifier supports master data management/entity resolution at the state level.                                                                                                                                                                                                                                                   |
| Enrollment           | Award Year                        | <b>Essential:</b> Award years serve as the basis for calculating various outcomes under the WFP Proposed Rules (see, e.g., 34 CFR 690.91).                                                                                                                                                                                                                                              |
|                      | State Program ID                  | <b>Essential:</b> State Program ID is necessary to uniquely identify each student's enrollments.                                                                                                                                                                                                                                                                                        |
|                      | Date Entered Program              | <b>Essential:</b> This date is necessary to determine timing for completion and placement calculations (34 CFR 690.91; 690.94(a)).                                                                                                                                                                                                                                                      |
|                      | Highest Education at Enrollment   | <b>Essential:</b> Necessary for determining WFP eligibility and for segmentation of outcomes evaluation by differing education levels: current high school student*, high school diploma, some college no credential, associates, bachelor's, graduate program enrollment or acceptance for enrollment*, graduate credential*) [ <i>* Not eligible for WFP</i> ] (34 CFR 668.32(2)(B)). |
|                      | Delivery Mode for Enrollment      | <i>Important:</i> Enables analysis of outcomes based on the modality used by the participant, if the program is offered in more than one modality (such as both in person and online).                                                                                                                                                                                                  |
| Financial Assistance | Workforce Pell Recipient          | <b>Essential:</b> A state should assess enrollment and outcomes information for all participants but will need to segment out WFP recipients for certain outcomes calculations. Additionally, necessary to ensure a student is not enrolled in multiple WFP programs (34 CFR 690.11(b)).                                                                                                |
|                      | Outside Financial Assistance      | <b>Essential:</b> A state should capture the amount of scholarship or grant funding from non-Federal sources, as WFP funding is only available to the extent a student has not received grant or scholarship assistance from non-Federal sources that covers the full cost of attendance (34 CFR 690.5; 690.80(d)).                                                                     |
|                      | WIOA Co-enrolled                  | <i>Important:</i> Reported by the institution if the individual's participation is funded through an Individual Training Account (ITA); allows identification of overlapping participants                                                                                                                                                                                               |

| Category                                   | Element                    | Essential or Important / Regulatory or Other Source Reference                                                                                                                                                                                                                                                          |
|--------------------------------------------|----------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                            |                            | across federal funding streams, facilitating joint accountability reporting and integrated service delivery.                                                                                                                                                                                                           |
|                                            | Employer Paid or Sponsored | <i>Important:</i> Enables assessment of extent of employer contributions to the state's workforce development system.                                                                                                                                                                                                  |
| Residence                                  | State of Residence         | <b>Essential:</b> Necessary to identify out-of-state individuals subject to bilateral agreement data reporting.                                                                                                                                                                                                        |
|                                            | County of Residence        | <i>Important:</i> Supports regional mobility and commuting analyses. By using a 5-digit county Federal Information Processing Standards ( <a href="#">FIPS</a> ) code, both state and county residential information can be captured.                                                                                  |
|                                            | Zip Code of Residence      | <i>Important:</i> Supports regional mobility and commuting analyses at a more granular level than county.                                                                                                                                                                                                              |
| Demographics                               | Race/Ethnicity             | <i>Important:</i> Enables disaggregated outcomes analysis and reporting.                                                                                                                                                                                                                                               |
|                                            | Military or Veteran Status | <i>Important:</i> Enables disaggregated outcomes analysis and reporting.                                                                                                                                                                                                                                               |
|                                            | First Generation Status    | <i>Important:</i> Enables disaggregated outcomes analysis and reporting.                                                                                                                                                                                                                                               |
|                                            | Disability Status          | <i>Important:</i> Enables disaggregated outcomes analysis and reporting.                                                                                                                                                                                                                                               |
| Withdrawal<br>[conditional, if applicable] | Last Date of Attendance    | <b>Essential:</b> Provides accurate data for calculating completion and placement metrics and aligns with WIOA exit-based performance measures.                                                                                                                                                                        |
|                                            | Basis for Withdrawal       | <b>Essential:</b> Identifies the reason a participant withdrew, including circumstances such as death, medical condition, military service, or incarceration. Certain withdrawal reasons exclude the participant from WFP completion and placement rates (34 CFR 690.94(e)).                                           |
|                                            | Tuition Refund             | <b>Essential:</b> Determines whether an individual who withdrew, dropped out, or was expelled actually received in a timely manner a refund of 100% of tuition and fees, which is necessary for calculation of completion rate (34 CFR 668.8(f); incorporated into the Proposed WFP Rules at 34 CFR 690.94(a)(2)(ii)). |

| Category   | Element                                                        | Essential or Important / Regulatory or Other Source Reference                                                                                                         |
|------------|----------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Completion | Date Completed Program                                         | <b>Essential:</b> This date determines inclusion in completion cohorts and triggers the earnings measurement period (34 CFR 690.94(a)(2)).                            |
|            | Resulting Recognized Postsecondary Credential Attained         | <b>Essential:</b> Indicates whether the participant earned the recognized postsecondary credential associated with the program upon completion (34 CFR 690.93(a)(3)). |
|            | Date Resulting Credential Attained                             | <b>Essential:</b> This date can be used to confirm successful completion and align outcomes measurements (34 CFR 690.94(a)).                                          |
|            | <i>[For credit programs only]</i><br>Number of Credits Awarded | <i>Important:</i> Enables analysis of outcomes variances in credit program structures.                                                                                |