Measuring Impact:
How to Approach Participant Data Collection

Table of Contents

About this Guide

The California Workforce Development Board's (CWDB) Research Unit has compiled this guide for all grantees to better understand the data reporting requirements for all grant programs. The guide contains relevant information for all participant-serving projects funded by CWDB grant programs, important reporting deadlines and general expectations.[1]

This is to help ensure that managing participant data in preparation for submission to the CWDB is as thorough and seamless as possible, with minimal burden. Ultimately, the CWDB wants grantees' data management efforts to reflect the great work and impact the grantee's program has on the workforce.

This guide supports grantees' efforts to collect and tracks participant data throughout the grant life cycle to ensure accurate information is reported about participants. It includes best practices for successfully developing effective data collection and tracking processes and incorporating them into the grant implementation.

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[1] Please note that this guide does not constitute legal advice and grantees are encouraged to consult with legal counsel for individualized guidance.

Data Collection Tips

Successful grant reporting doesn't just happen. Before grantees can successfully report on a grant to CWDB, certain required information must be successfully tracked and collected. Doing this takes careful planning and forethought.

Often, grantees realize that there were missed opportunities to capture needed information or realize that so many moving pieces couldn't be shared accurately and on time. Even though the grantee's programs may be performing well, those successes are not reflected in the data. Grantees then must spend a lot of time tracking down information or training partners and staff on brand-new policies, which could have been avoided with better data management protocols in place.

The best time to start thinking about participant reporting is before grantees enroll any participants. Procedures should be established ahead of time to allow grantees to collect the information from participants and continue tracking them throughout the grant program and beyond.

Below are some suggested steps that grantees can use during the grant start-up phase. These steps will help set the grant up to successfully collect and track participant information in accordance with grantee's contract with CWDB:
- Understand the reporting requirements and deadlines.
- Understand funding streams.
- Understand what information to collect and why.
- Understand the timing of when information should be collected.
- Develop an internal case management system.
- Establish intake procedures that build-in participant data collection.
- Establish a schedule to check-in with participants regularly.
- Establish processes and methods to follow-up with participants after they leave the program.
- Establish a process for regularly collecting information from grant partners.
- Develop policies for documenting, validating, and securing data.
- Understand technical assistance resources.

This guide contains a toolkit of strategies and tips to help implement each of these steps. If participants have already started enrolling in a particular program(s), these tips can be used to develop new procedures and refine the ones that are currently in place to continue improving data collection and tracking processes.

Understanding Reporting Requirements and Deadlines

Grantees must report various types of data about projects and the participants they serve. Different types of data grantees are contractually obligated to report to CWDB including participant data, narrative reports, and occasionally supplemental reports. There are different deadlines for reporting data depending on the type of data. Many grant programs require data

to be reported both monthly and semi-annually. Refer to the data types outlined below and follow the appropriate reporting schedule.

Grantees are contractually obligated to ask all participants for their Social Security Numbers (SSNs), and to report participants' SSNs gathered and outcomes to CWDB. It is important to note that, while grantees are required to request participants' SSNs, participants cannot be denied services if they choose not to disclose their SSN. The same is true of all participant demographic data collected in Cal-E-Grants for grant reporting purposes. Grantees must ask participants questions about identifying information in all fields CWDB provides to them. However, opting out of answering is always an acceptable answer. Grantees must report all information gathered about participants to CWDB, including any "opt out" answers.

Participant Data

Participant data is arguably the most critical type of data that grantees will collect and report to the CWDB. This data can indicate the overall success of grant programs and is used to inform future workforce funding. Participant data is collected in either California's Job Openings Browse System (CalJOBS) or Cal-E-Grants, depending on the grant program. As a best practice, participant data should be entered as soon as it is gathered. CWDB will review participant data every **month**. If grantees have not input all collected participant data for a particular month by the 20th of the following month, they are in breach of the grant agreement, including risk of de-obligation and ineligiblility for future funding. Refer to the Reporting Schedule tables in the following section for relevant deadlines.

Narrative Reports

Narrative reports provide overall project status updates in a narrative format. Narrative reports are due on a **semi-annual** basis and submitted in Cal-E-Grants. The templates for narrative reports are typically made available in Cal-E-Grants 1-2 months before the submission deadline and are in an open-ended question format, allowing for narrative answers. Grantees must submit timely narrative reports or risk being in breach of the grant agreement.

Quarterly Check-In Meetings

Check-ins are virtual meetings that allow grantees to report project successes, challenges, and overall project progress. These meetings are scheduled **quarterly** for the first year of the grant term. After the first year, the Program Branch will conduct a formal analysis to see if recurring quarterly meetings will continue or discontinue (if discontinuing, meetings will be scheduled as needed and not necessarily on a recurring, quarterly basis). Note that there will always be a formal meeting at the halfway point of the grant (known as the "Interim Analysis") to discuss project deliverables.

Reporting Schedules

Monthly Participant Data Reporting Schedule

Reporting Period	Reporting Deadline
January 1 – January 31	February 20
February 1 – February 28	March 20
March 1 – March 31	April 20
April 1 – April 30	May 20
May 1 – May 31	June 20
June 1 – June 30	July 20
July 1 – July 31	August 20
August 1 – August 31	September 20
September 1 – September 30	October 20
October 1 – October 31	November 20
November 1 – November 30	December 20
December 1 – December 31	January 20

Semi-Annual Narrative Reporting Schedule

Semi-Annual Period	Reporting Deadline
January 1 – June 30	July 20
July 1 – December 31	January 20

Understanding Funding Streams

Understanding differences in funding streams of grant programs helps make sense of the differences in reporting requirements. Grant programs funded by the Workforce Innovation and Opportunity Act (WIOA) are mandated through federal legislation to collect participant data in CalJOBS. However, grantees for state-funded, non-WIOA programs are required to report participant data in Cal-E-Grants. The CalJOBS platform is managed by the Employment Development Department (EDD) and was specifically built for WIOA programs. The CWDB uses the Cal-E-Grants platform for participant data collection for these programs because state-funded grant programs offer more flexibility and less stringent requirements. The CWDB has the authority to make changes within Cal-E-Grants, and using this platform for state-funded programs streamlines overall grant management for both CWDB and grantees.

Understand What Information to Collect and Why
Why Participant Data?
By law, the CWDB is charged with continuously improving California's workforce system, and in doing so, asks questions like:
- How can workforce development better reach historically marginalized populations?
- How do grantees keep participants from dropping off the radar?
- Which types of services have the greatest impact on participants' employment and wages?

To answer these questions, the CWDB needs data. For instance, the CWDB must know who is being served, what backgrounds participants have, how participants are being served, what services were provided, and how program services affected participant outcomes. This is why the CWDB collects data —to ensure continuous and equitable improvement of the California workforce system.

Collecting sensitive information
Some data collection topics are sensitive, which may affect the strategies used for accurate reporting. Examples of sensitive topics include:
- Social Security Number (SSN)
- Income
- Race/Ethnicity
- Gender identity
- Sexual orientation

Low response rates
Not receiving enough data or information about participants being served by CWDB grant programs has various implications. It limits CWDB's ability to determine:
- The efficacy of programming.
- If the CWDB is reaching focus populations.
- How target populations are being served.
- Where best to allocate future funding.

Some potential outcomes of asking sensitive questions
There are at least three primary outcomes of asking sensitive questions, all of which can affect the quality of data:
- Participants refuse to provide the information and decide not to participate in the program once sensitive questions are asked.
- Participants agree to provide information but leave some information blank.
- Participants provide inaccurate responses or under-report information.

When to ask questions
It's not always clear how respondents will respond to sensitive questions. For the CWDB to accurately determine if and how programs serve communities across California, grantees must have data on the participant's workforce funding services. In some instances, this means

collecting sensitive information that may be uncomfortable for participants and staff to discuss openly.

How to collect better data when asking sensitive questions
Some suggestions:

- *Include a self-administered survey or application as part of the intake process.*
  Creating a self-administered survey as part of the intake process, when possible, increases the chances that participants will provide sensitive information. This could be completed in private and may feel less intrusive.

- *Assure confidentiality.*
  Describe what steps are being taken to ensure the data collected is protected. How will the information be used, and who will have access to it? Systems for securing sensitive information should be in place by the grantee before any sensitive information is collected, so it can be stored correctly.

- *Explain why information is being collected verbally and in writing.*
  Adequately explain why participants are being asked for this information (and how it will be used). For example, before asking for detailed demographic information, grantees might first explain, "We ask about income and housing insecurity to understand the types of supportive services that you might benefit from to be successful in this program." Refer to the Sample Disclaimer section in this document for examples of potential disclaimers related to the collection of sensitive information.[2]

- *Put demographic questions at the end of the intake process.*
  Sharing personal and sensitive details when beginning a new training program can make respondents feel uncomfortable due to past experiences or challenges accessing programs or services. For some questions, respondents may also feel shame or discomfort sharing information due to past experiences. This may make people more reluctant to answer sensitive questions honestly. It is better to save demographic questions for the end.

- *Present sensitive questions toward the end of the intake process (but not the very end).*
  When an information gathering session begins with sensitive questions, this can feel jarring and intrusive for some training participants. Build trust by asking fewer sensitive questions upfront. Once grantees have built rapport and trust, then ask sensitive questions. These questions should be part of an ongoing case management strategy to allow for the gradual collection of participant information as trust develops.

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[2] CWDB cannot provide legal advice or assurances that the sample disclaimers are currently compliant with all applicable laws. Grantees may consider consulting with legal counsel to ensure it is complying with all notice requirements.

Personal Information Notice
Effective Date: 9/12/2023

The California Workforce Development Board (CWDB) administers its programs as authorized by current legislation. It collects Personal Information (as defined in CWDB's Privacy Policy), including name, social security number, birth date, and address.

Providing this information is mandatory. Without it, the CWDB cannot effectively complete program evaluation and participant eligibility effectively. The CWDB collects Personal Information for the purpose of:

- Program Evaluation
- Participant Eligibility

Any organization that submits Personal Information to CWDB or its service providers represents and warrants that:

- They have the authority to disclose the information and use the information in accordance with this Notice of Collection, and
- The information is accurate.

Participant data collected by the CWDB includes information in the following general categories:

- *Individual demographics:* Such as name, birth date, racial or ethnic group, disability, employment status, social security number, and address.
- *Training services:* Dates and types of training services that participants receive while in the program, including apprenticeships and service providers.
- *Career services:* Dates and types of career services that participants receive while in the program, including work experience and service providers.
- *Supportive services:* Dates and types of supportive services that participants receive while in the program, including stipends and service providers.
- *Credentials:* Credentials received, including industry-recognized certificates resulting from the training provided in the program.
- *Outcomes:* Information related to post-exit from the grant program, including training and employment.

Definitions for the variables collected in both CalJOBS can be found in the Participant Individual Record Layout (PIRL). Definitions for variables collected in Cal-E-Grants can be found in the Data Fields Guide.

Collecting Social Security Numbers
The Office of Management and Budget (OMB) defines Personally Identifiable Information (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 should ensure that when collecting this information from

participants, participants are informed of the reason for requesting SSNs in accordance with the CWDB's Privacy Policy and the grantee's privacy policy.[3]

Grantees have reported that employer partners and training providers can be sensitive to the collection of SSNs and forms that include questions identifying race and/or ethnicity. Participant intake forms should include disclaimer language around the collection of SSNs. The CWDB, 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 for CWDB to collect consistent and reliable aggregate outcome information for each grantee. CWDB calculates a set of Workforce Innovation and Opportunity Act Indicators of Performance that include entry into employment, employment retention, and median earnings.

Note: A system that allows sensitive information to be stored securely by the grantee needs to be in place before such information is collected from participants. Please refer to the *Develop Policies for Documenting, Validating, and Securing Data* section in this document for more information and best practices.

Sample Disclaimer Language on the Collection of Personally Identifiable Information
Grantees may use the following sample text to inform participants how PII is being protected and why SSNs are being collected. Underlined text should be tailored appropriately to individual projects/programs.

"This project was funded by a grant awarded under the <Grant Program; example: High Road Training Partnership>, administered by the California Workforce Development Board (CWDB). By state [4] and federal law,[5] the CWDB must collect a range of demographic information about project participants to track the long-term success of this training program. One piece of information collected is the participant's Social Security Number (SSN). The CWDB asks participants to provide SSNs so that employment information can be matched through state databases. Although you cannot be denied service for failure to provide your SSN, we strongly encourage you to provide it so that the project can measure employment-related outcomes. Without this information, we cannot understand how helpful grant programs like this are to participants.

Rest assured that we keep your personal information confidential and secure. It will not be shared with any outside agencies other than those involved in supporting or overseeing the High Road Training Partnership grant received by <Grantee> and issued by the CWDB. Your

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[3] The CWDB cannot provide legal advice regarding privacy law compliance. Grantees are encouraged to consult with legal counsel in developing and maintaining their own privacy policies to comply with all applicable laws in collecting, storing, and transmitting participant data.
[4] CWDB is legally mandated to collect participant data in UIC § 14014, UIC § 1095, Executive Order N-16-22, and in various other initiative-specific legislation.
[5] 29 U.S.C. 3245(d)(1)(A)

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 <u><Name>, <Title></u> at <u><Contact Info></u>."

Sample Disclaimer Language on the Collection of Sensitive Demographic Information
Grantees may use the following sample text to inform participants why their sensitive demographic information is being collected and their option to opt out of providing such information.

"As required by state[6] and federal law,[7] the CWDB collects sensitive demographic information relating to gender identity, sexual orientation, and public benefit recipiency for the purposes of statistical analysis and reporting to the Labor and Workforce Development Agency (LWDA). Reporting this information helps the CWDB and LWDA gain a better understanding of the communities our funding serves. It allows the CWDB to measure the outcomes of various grant programs, which in turn informs future workforce development funding.

We maintain demographics confidential and never share identifiable information with outside agencies. Providing this information aids CWDB grantees to continuously improve service delivery for current and future participants. However, participants have the right not to disclose information related to gender identity, sexual orientation, and public benefit recipiency, free of penalty. There are no risks in providing demographic information, and participants do not directly benefit from reporting their demographic information. If you have questions, concerns, or complaints, or think the research has hurt you, email the CWDB research team at *ResearchUnit@cwdb.ca.gov*."

Understand the Timing of When Information Should be Collected
Thinking through the best times in a participant's journey through the 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 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 when collecting 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.

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[6] CWDB is legally mandated to collect participant data in UIC § 14014, UIC § 1095, Executive Order N-16-22, and in various other initiative-specific legislation.
[7] 29 U.S.C. 3245(d)(1)(A)

Required Information	Suggested Point of Collection
Participant Information (Name, SSN, Eligibility Demographics)	• Eligibility determination • Intake
Training, Career, and Supportive Services	• Orientation • Service start date • Ongoing
Credentials	• Date credential received
Outcomes	• Exit or follow-up surveys post-completion or post-exit

Participant data is not required to be collected in this specific order, although it may make sense depending on service delivery. For example, in certain instances, some participant demographic information could be collected at a later stage if necessary. Please refer to the Request for Applications (RFA) for the appropriate grant program for more specific information on participant eligibility before starting the intake process, as well as the reporting requirements for the designated data collection system being used in order to develop an approach that works best for your organization and complies with the conditions in the grant agreement.

Develop an Internal Case Management System

It is essential to maintain case files for each participant using an 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 with the ability to make changes to reflect new information throughout the grant life cycle. While Cal-E-Grants does not yet function as a case management system, some grantees use CalJOBS for case management and transfer participant data into Cal-E-Grants monthly. If CalJOBS is the preferred case management platform for your organization, a local grant code can be created in CalJOBS for state-funded programs.

Using the Local Grant Code consists of two steps:
1. Activating the local grant under the WIOA application, and
2. Adding the local grant under the related activity.

Steps To Activate the Local Grant Under the WIOA Application
1. Access the participant's WIOA Title 1 application wizard to get started and go to the **Eligibility Summary** section.

2. Scroll down to the Non-WIOA Grants area, and under **Local Funded Grants**, select Yes.
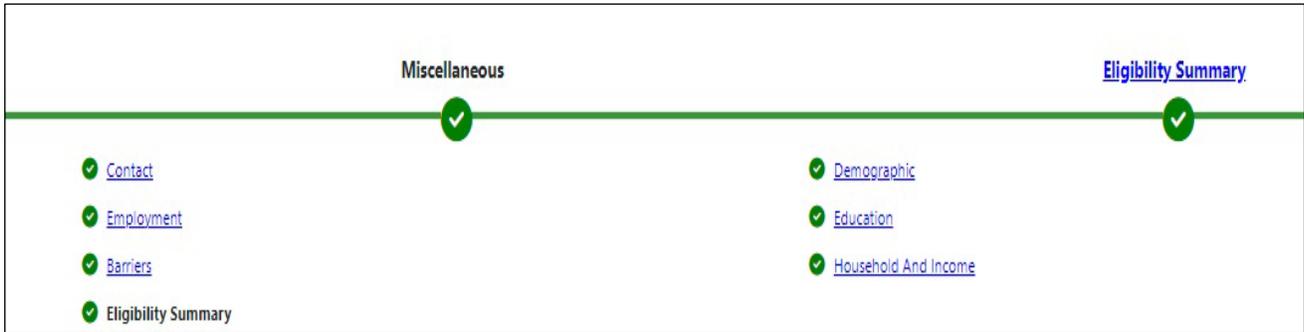

Figure 1: Eligibility Summary section

Figure 2: Non-WIOA Grants section of Eligibility Summary

Note: If adding a state-funded grant program, select Yes next to **Non-WIOA Special Grants**.

Steps to Add the Local Grant Under the Related Activity
A list of all available local grants will appear. Find the local grant code and select **Add** under the **Action** column. Select **Finish** at the bottom of the page to save the update to the application. Now, an activity can be created for the participant using the activated l local grant code.

1. Select **Create Activity/Service/Enrollment** under the **Activity/Service/Enrollment** section of the WIOA application. (On a newly created WIOA application, select **Create Participation** to create an enrollment and a first activity.):

Grant Type	Grant ID	Grant Name	Local Grant Code
NonWIOA Special Grant	188	HIGH GROWTH & EMERG IND	150
NonWIOA Special Grant	454	2100-State Apprenticeship Expansion, Equity and Innovation Grant	2100
NonWIOA Special Grant	460	ELL IET – English Language Learners Integrated Education and Training	2083
NonWIOA Special Grant	462	United Way - Regional Investment Initiative - Economic Development Pilot	1010
NonWIOA Special Grant	463	Firefighter Joint Apprenticeship Program	NA
Local Funded Grant	294	SAC EMPLOYMENT/TRNG AGENCY Local Code 904	SAC904

Figure 3: List of Available Grant Codes

Figure 3: Expanded Activities/Enrollments/Services section

2. Under **Customer Program Group**, select **98 – Local Funded Grant**.

Figure 4: Customer Program Group field

3. In the Enrollment Information section, select the grant activated under the WIOA application in the **Grant** field.

Enrollment Information

Grant: SAC904 - SAC EMPLOYMENT/TRNG AGENCY Local Code 904 ▼

WIOA or Non-WIOA Partner Program: ☐ **Yes**, service is a WIOA or Non-WIOA Partner Program.

* Activity Code: [ ] [ ]

[Select Activity Code ⎘]

Projected Begin Date: [ ] (mm/dd/yyyy) 📅 <u>Today</u>

Actual Begin Date: 05/15/2024

Actual begin date may not be modified on the first activity.

* Projected End Date: [ ] (mm/dd/yyyy) 📅 <u>Today</u>

Service Provided <u>Virtual/Online</u> ⎘: No Virtual/Online, In-person Only ▼

Figure 5: Enrollment Information section

4. Create the rest of the activity. Once the activity has been created, the participant will have an open activity with the **Funding/Grant** displaying the locally funded grant that was selected.

⊟ Activities / Enrollments / Services

Create Activity / Enrollment / Service

Status	ID #	Activity / Provider	Actions	Funding / Grant
🟢 O	2846434	101 - Orientation SETA/Sacramento Works	🟣 W	Local Funded Grant SAC904 - SAC EMPLOYMENT/TRNG AGENCY Local Code 904
				◀◀ ◀ Page 1 ▼ of 1 ▶ ▶▶

Figure 6: Funding/Grant column indicating Local Funded Grant

An existing case management system may be sufficient, but grantees should ensure they have reliable and secure methods for tracking all data elements on intake and throughout the period a participant is receiving grant-funded services.

HOT TIPS
- Make sure the system includes EVERY required data element as a data field entry for each participant record.
- Make sure the system records all the data elements entered into CalJOBS or Cal-E-Grants.
- 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 partners can follow to help ensure they are collecting information in the same way. Provide the partner with a template and request that this format be used to submit participant data to the fiscal agent.

Establish Intake Procedures that Build in Participant Data Collection

Gathering the information needed to inform the data elements should be integrated into every aspect of the onboarding process (including eligibility assessment, intake, and orientation). Before recording participant data on an individual, first establish whether an individual is eligible for the training program and activities.

For example, when participants are deemed eligible to participate, the birth date collected and used to determine if a participant was of age to receive services can be included in the internal case management system for future reference if they receive additional services or training.

Best Practice: Tracking this information in an electronic format will give grantees, employer partners, training providers, and other stakeholders to track outcomes in a systematic way that will help ensure consistency and accuracy.

When an individual is determined to be eligible for specific program activities, grantees will need to establish an intake process to assess and collect information from that individual. An intake process could entail processes like:
- Completing intake forms.
- Conducting an intake interview.
- Hosting intake sessions and/or other orientation activities.

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

Often, definitions for the data elements themselves can be used as questions to develop intake and enrollment forms. When the language from data elements is transferred to questions on the form, this can ensure that the questions are: 1) being asked in a way that explains the purpose, and 2) consistent with how outcomes need to be reported.

HOT TIP

The intake process can also be self-registered electronically. Advantages to self-registration are that participants can eliminate steps in the case management process and make securing data easier. However, if the software is not user-friendly, participants may end up skipping the registration process altogether.

If grantees decide to go the electronic route, ensure that training and support are provided on software use. Build in other opportunities upfront to establish a relationship with the participant so your group can explain why the information solicited is needed and required by law.

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 needed to report all the required data to CWDB is an ongoing process that will continue until the grant ends, and in some cases, after the grant term has ended. The CWDB will track employment outcomes using the base wage file if a participant provides their SSN, but if not, post-exit employment and wages can be tracked through post-exit surveys from participants for two quarters following the end of the grant term.

First, grantees should consider how they will collect the information. Several methods, such as phone calls, meetings, or surveys, can be used to collect participant feedback. It is important to determine the best method based on the program and capacity. Be willing to pivot to a new method if one doesn't seem to be working.

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

Grantees may experience challenges attempting to follow up with participants, but there are many ways to minimize those challenges if the stage has been set for collecting the participant data when they walk in the door. Setting the expectation with participants from the beginning that grantees will be in regular contact with them throughout their training and after they complete the program leads to a greater likelihood that grantees will be able to get the information needed.

HOT TIPS

Use these tips and incorporate them into a tracking strategy while participants are enrolled in training programs:
- Send calendar invitations to 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 ways of asking for the needed information in surveys to see what gets the most helpful responses.
- Give participants the opportunity to provide multiple phone numbers and/or email addresses at intake for follow-up purposes.
- At every check-in, give participants the opportunity to update their contact information.
- Make check-ins short.

Establish Methods to Follow-up with Participants Post-Exit

Following up with participants once they leave the training program is crucial. Meeting the reporting requirements for CWDB grant programs includes reporting changes in employment for participants who complete training programs. To report this information, grantees will need to find ways to gather employment information on these participants even if they are no longer in regular contact.

It may be valuable to re-frame the participant-program relationship and develop a program design that incorporates indefinite contact with 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. An incentive policy helps maintain a connection with the participants and can assist grantees in collecting this information.

HOT TIPS

All the strategies from the "Hot Tips" in the previous section for tracking participants while still in training can also be used for following up with participants after the program ends. Additionally, try some of these additional strategies:
- Use incentives to pay for specific tools or aids participants need for their jobs, such as exam fees, scrubs, tools, or other job-related fees or equipment.
- Hire a job developer whose job 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 to grant participants.
- Send calendar invites to participants to build in time for them to complete surveys to highlight their importance.
- Conduct qualitative interviews to gather information that participants might not 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 a Memorandum of Understanding with employer partners to provide information on participants about changes in their employment.

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 of the grant. Although training providers, employers, workforce agencies, or other types of service providers may not have access to CalJOBS or Cal-E-Grants 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 collected, stored, and transmitted securely.

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

HOT TIPS

Use these 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 transferred between appropriate program partners to better assist the development and submission of monthly and semi-annual reports to CWDB.
- 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.
    - **Example:** Training participants are often given 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 notice, disclaimer language, and guidance during the enrollment process so participants will understand why certain information is being collected.
- Ensure relevant dates that inform certain data elements are recorded.

Develop Policies for Documenting, Validating, and Securing Data

Documenting and Validating Data

Although the CWDB does not collect documentation to validate participant data, grantees should maintain records to verify the data they report on participants in case an audit is conducted. Audits or monitoring are typically conducted by outside state agencies, such as the Employment Development Department (EDD) Compliance Review Office (CRO), **not** the CWDB. Recipients of WIOA-funded programs must retain records for a period of **three (3) years** from the date of their last expenditure report submitted to the EDD Central Office Workforce Services Division. Please refer to the appropriate Source Documentation List provided by the CWDB to ensure that the correct documentation is collected for state-funded and/or WIOA grant programs.

Documentation for state-funded programs is not required to be submitted to the CWDB but should be collected and stored securely for three years in the event of an audit. Documentation must be uploaded to CalJOBS for WIOA-funded grant programs.

Grantees should also review aggregated reports available on either CalJOBS or Cal-E-Grants each quarter for accuracy and to ensure CWDB's official data matches the partner's records and correct and update the data file as needed. Data change requests can be initiated by emailing the Research Unit directly.

Securing Personally Identifiable Information
Grantees may possess large quantities of Personally Identifiable Information (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. The easiest way to securely store this information electronically is through encryption, which protects the data from unauthorized access. Once encrypted, it can also be sent via an encrypted email, which requires a password to open.

If any email contains PII either in its body or attachments, an easy way to add a layer of protection is to use email encryption. The following instructions outline how to use email encryption within Outlook and Gmail at the time this guide was created.

Encrypting emails containing PII (Outlook)
Take the following steps to encrypt a single email message:
1. In the message being composed, select **File > Properties**.
2. Select **Security Settings**, then select the check box for Encrypt message contents and attachments.
3. Compose the message and **Send**.

Take the following steps to encrypt all outgoing messages:
When encrypting all outgoing messages by default, messages can be written and sent the same way as any other message. Still, all potential recipients must have a digital ID to decode or view the messages.

Take the following steps to encrypt all outgoing messages:
1. On the File tab, choose **Options >Trust Center > Trust Center Settings**.
2. On the **Email Security** tab, under *Encrypted* email, select the check box for Encrypt contents and attachments for outgoing messages.

Note: To change additional settings, such as choosing a specific certificate, select **Settings**.

Encrypting emails containing PII (Gmail):
Take the following steps to send a confidential message in Gmail via a web browser:
1. Log in to your Gmail account.
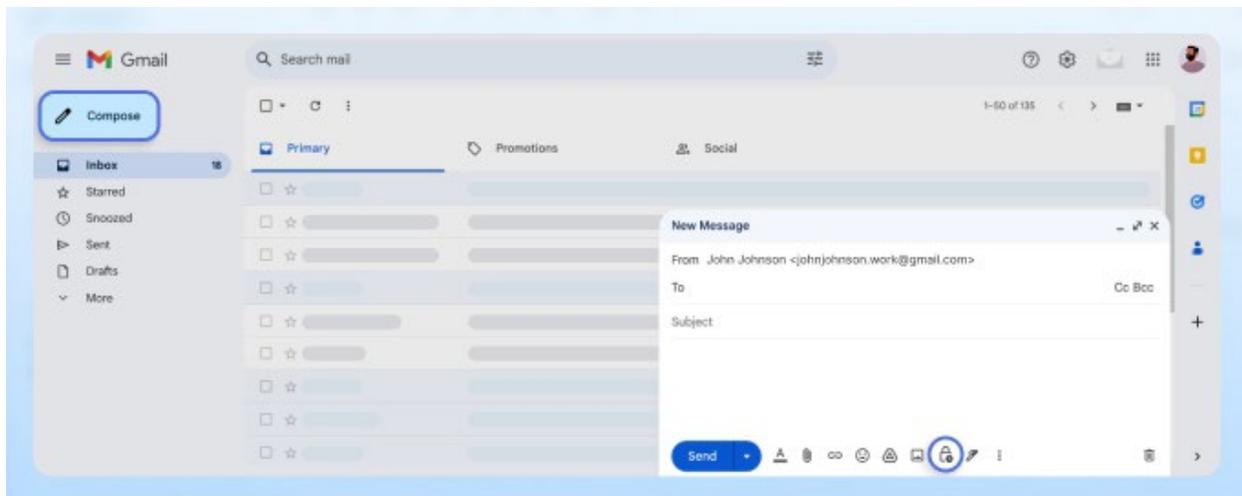2. Select **Compose.**

Figure 8: Confidential Mode toggle

3. Select the **Confidential Mode** toggle in the bottom right of the window.
4. Set an expiration date and passcode.
5. Select **Save.**

Tip: Utilizing an electronic case management system that allows grantees to upload and store all documents can help maintain security and reduce the need for paper file storage. Platforms such as Box, Dropbox, SharePoint, and Google Drive offer secure file storage while facilitating document sharing for registered users. Please note that if using Google Drive, files must **not** be synced with email addresses outside of the address that has been granted access to maintain security.

Password Protecting Excel Files:
Excel files containing PII can be secured with password protection, making them safer to share with partners. When using password protection to store an Excel file securely, ensure the password is complex and uses special characters, uppercase and lowercase letters, and numbers. At the time this document was created, the following steps outline how to protect the Excel file with a password to prevent others from accessing data in the file.
1. Select **File > Info.**
2. Select the **Protect Workbook** box and choose **Encrypt with Password.**
3. Enter a password in the **Password** field, and then select **OK.**
4. Confirm the password in the **Reenter Password** box, and then select **OK.**

Understand Technical Assistance Resources
The Research Unit at CWDB is available for technical assistance in reporting participant data and issues related to the CEG platform. The Research team can be contacted directly by emailing ResearchUnit@cwdb.ca.gov. Additional guidance and resources related to participant data and reporting are available on the Grantee Guidance webpage.

For grant administration or invoicing assistance, contact the appropriate Program Analyst or team for the specific grant. If grantees are unsure who the assigned Program Analyst is, contact the general inbox for the grant program or the [Research Unit](#).

For any other general assistance needed, please contact the contracted Technical Assistance (TA) provider for the grant program. If grantees are unsure who the contracted TA is for their grant program, they can contact the appropriate Program Analyst for more information.

Appendix

1. [Participant Individual Record Layout (PIRL)](#)—CalJOBS
2. [Data Fields Guide](#)—Cal E-Grants [WIOA Source DocumentationCEG Source Documentation](#)