

Action Requested

The California Workforce Investment Board (State Board) is asked to approve the Eligible Training Provider List (ETPL) policy criteria outlined below.

Background

In January 2013, the State Board's Issues and Policy Committee formed the ETPL ad hoc subcommittee. Its membership included representatives from a broad list of stakeholders (ad hoc member roster is included). The subcommittee was tasked with addressing the following items:

- a) Identify the minimum performance standards for private postsecondary education training providers to be included on the ETPL. Local boards can develop more stringent local performance requirements for their training providers approved locally,
- b) Develop administrative processes to ensure the California Bureau for Private Postsecondary Education (BPPE) and its reporting system is leveraged and that ETPL providers adhere to BPPE requirements,
- c) Determine minimum performance standards for the Department of Industrial Relations' Division of Apprenticeship Standards (DAS) registered apprenticeship programs and the administrative process for their inclusion on the ETPL,
- d) Establish procedures to ensure the ongoing management of the ETPL and that training providers maintain performance standards, and
- e) Ensure the role and responsibilities of local boards outlined in WIA are maintained.

The subcommittee met twice and provided input on draft documents developed by staff. The resulting policy revision addresses all the issues outlined above. This policy establishes statewide minimum performance standards for all three categories below and specifies that training programs must be in priority industry sectors that have been identified either through the local planning process or the state economic analysis. All ETPL programs to be subject to an annual performance review to ensure only quality training programs are included and remain listed on the ETPL. Specifically, the policy revision requires:

Policy Criteria

Private Postsecondary Training Programs: Must meet and maintain a 70% placement rate for all eligible graduates in that program. Training must be for occupations in priority sectors identified in the State plan and/or local area plans. Training must result in completion/receipt of an industry recognized credential,

certificate, or degree, including all industry appropriate licensing and/or certification requirements.

Definition of Placement Rate for BPPE Approved Programs: Placement is measured six months from the graduation date of each student, and reports all students in the program compared to those who have gained employment in the field of study. This calculation excludes students who meet specific exclusion criteria (e.g. death, incarceration, active military duty, continued education beyond graduation, etc.)

California Community College Programs: Must achieve and maintain a 70% certificate or credential attainment rate overall and a 70% Placement Rate in training-related employment for WIA enrolled students in that program. Training must be for occupations in priority sectors identified in the State plan and/or local area plans. Training must result in completion/receipt of an industry recognized credential, certificate, or degree, including all industry appropriate licensing and/or certification requirements.

This category of program will not be subject to the initial performance standards as data to evaluate performance is not currently collected. However, the performance criteria will be applied to these programs in subsequent years.

DAS Registered Apprenticeship Program: Maintain a 70% Apprenticeship Completion rate.

Definition of Completion Rate for DAS Programs: State-registered apprenticeship programs, which have had at least two (2) graduating classes, which have had an annual apprentice completion rate of at least 70% of the average completion rate for two (2) consecutive years for the applicable trade or occupation as verified by the State Division of Apprenticeship Standards.

Implications

- a) The policy ensures the state requirements for training providers, subject to registration and approval to operate by BPPE, are properly vetted and comply with BPPE's annual performance reporting requirements.
- b) The policy provides a documented method to review performance, for both the initial determination and an annual performance assessment, to list and retain only those programs that meet and maintain the state's minimum level of performance.
- c) The policy implements administrative solutions to list programs offered by the campuses of the California Community College system as well as apprenticeship programs registered with DAS.

- d) Some providers, with history of providing training services to WIA clients may not have registered or have not received approval to operate by BPPE. This could result in some providers that provide quality training programs being removed from the list, pending their approval by BPPE. The policy includes a transition period to January 1, 2014 to ensure all providers listed on the ETPL are properly registered and approved to operate by BPPE.
- e) The list will be reviewed annually by the state and local boards. The timelines associated with this performance review are outlined in Steps b-h below. If programs do not meet the performance standards, the local board will notify them of their removal from the ETPL. The State Board will also remove training programs if they have not complied with BPPE's annual report card requirement. The policy also includes detailed instructions regarding notification and appeal procedures.

Timeline

- a) September 2013
DRAFT Policy Directive is published for 30-day public comment period.
Training Providers are required to submit their Annual Report of Performance to BPPE.
- b) December 2013
The Employment Development Department (EDD) provides lists of providers by local area to local boards for review and subsequent eligibility determination.
- c) February 2014
Local boards complete the local review of training providers and subsequent eligibility determination and forward the list to EDD.
- d) March/April 2014
Local boards notify the providers that have been delisted and provide information on appeal procedures.
EDD shall verify with BPPE that reporting requirements have been satisfied, retain all providers that meet the performance criteria, and delist all providers that do not meet the performance requirements.
- e) May 2014
EDD shall notify the providers that have been removed from the ETPL due to noncompliance with BPPE reporting requirements and provide information on the appeal process. EDD will also notify local boards of training providers that have been removed from the ETPL to ensure that referrals are no longer made to that program.
- f) June 2014
EDD will update the ETPL and republish the list.

- g) October 2014
Staff will complete and submit a report to the Issues and Policy Committee and the State Board on the policy implementation and outcomes.

Next Steps

A draft policy directive will be issued in September 2013 for a 30-day public comment period. The final policy will be issued in October 2013.

Feedback on implementation issues -- including evaluation of performance, annual review, and criteria for developing local ETPL policies -- will be integrated into directives and guidance.