

## Jefferson/Franklin Consortium Local Eligible Training Provider List Policy

The Jefferson/Franklin Consortium Workforce Development Board (WDB) elects to supplement the criteria and information requirements established by the State to support informed consumer choice and the achievement of local performance indicators except in the case of Registered Apprenticeships. § 680.430(c).

### **ETPL Provider/Program Approval Procedures**

For initial local approval:

When an eligible participant selects a training provider from the State's approved provider list, staff will ensure the program is approved and in good standing on Missouri's Eligible Training Provider List (ETPL). The individual training **program** must be approved on the ETPL, not just the provider.

The Board does not approve programs from providers that are "online only". Online only providers are defined as those who do not maintain a physical location for students to attend classes.

Staff will contact the training provider to provide local requirements outlined in this policy.

Staff will ensure the following requirements are met before approving the provider for local funds:

- The program is listed on the Missouri ETPL.
- Training-related performance of past graduates will be evaluated for employment rate (2<sup>nd</sup> and 4<sup>th</sup> quarters after exit), median earnings, credential attainment and measurable skill gains performance rates. This requires the training provider to collect and report job placement data on its graduates. The training provider must meet or exceed the WIOA negotiated performance measures for the region. The most current performance measures can be found in section 26 of the Local Plan narrative.
- Staff will do their due diligence to ensure that individuals coming into the Job Center with similar training/credentials are able to earn a living wage with that training or credential (To ensure we are not paying to train individuals for occupations that do not move them out of poverty).
- Staff will do their due diligence to ensure that at least 60% of participants that start a training program complete the program.
- Staff will compare the cost to complete the program to ensure it does not exceed 200% of the amount of completing the equivalent program at other local training providers on the State ETPLS within a reasonable distance.

If the above criteria are met, the WDB Staff will reach out to the training provider to verify contact information and explain the vendor packet required to receive WIOA

tuition payments from Jefferson/Franklin Counties.

### **Expected Performance Levels**

The U.S. Departments of Labor and Education requires all approved training providers to collect and share data on the outcomes of all students, not just WIOA participants, for providers and programs listed on the ETPL list. Eligible Training providers must meet or exceed the Local WDB's negotiated\* performance benchmarks:

- Employment Rate (second and fourth quarters after exit)
- Median Earnings
- Credential Attainment
- Measurable Skill Gains

\*Performance is negotiated bi-annually with Missouri's Office of Workforce Development. (see section 26 of the Local Plan narrative)

Apprenticeship programs registered under the National Apprenticeship Act are not required to submit performance information as long as they remain registered with USDOL, Office of Apprenticeship, but may voluntarily submit the information.

### **Procedures for PELL Grant Reimbursement**

WIOA funding should be a final resort for training. All participants deemed appropriate for occupational training will be required to apply for available grants under Title IV, as well as any other financial aid that may be available to them (not including loans).

When a participant is eligible for Pell, it is to be used for other Pell eligible expenses with WIOA paying tuition, books and/or fees.

Pell and other grant awards shall be considered in the context of the full cost of participation in training activities. In the instance that funds are necessary for other training related expenses, and Pell or other grant funds are available to meet this funding need, a financial needs determination will be completed to calculate the amount of this need, and level of required WIOA funding support. Participants who are full-time students receiving federal Pell Grants may retain up to 50%, and part-time students may be allowed to retain up to 25% of the federal Pell Grant to assist with other appropriate costs, while in training. Staff must maintain documentation to support the determination to retain a portion of the federal Pell Grant and must enter a case note explaining how the determination was made. The case manager must also document the mix of training and supportive services funds from WIOA and other funding sources, including Pell Grant funds, in a case note.

If PELL is received after obligation, the participant and/or training provider must inform staff of additional funds to be considered. If PELL is applied, participant and/or training

provider agree to reimburse the Local WDB, if WIOA funds have already been disbursed.

### **Terms and Expectation of Eligible Training Providers**

- The training program is listed on the Missouri ETPL.
- Training-related job placements of past graduates' meets or exceeds the [WIOA](#) negotiated performance benchmarks (completion rate, credential attainment, and employment measures) required for the current Program Year. These benchmarks can be found in section 26 of the Local Plan narrative. This requires the training provider to collect job placement data on its graduates. This data must be made available to staff for local approval.
- Individuals with similar training/credentials are able to earn a living wage with the training and credentials provided by the training provider.
- Staff will do their due diligence to ensure that at 60% of the participants that start a training program complete the program.
- The cost to complete the program is not higher than twice the amount of completing the approved equivalent program at other local training providers on the State ETPL.
- The cost of supportive services required to complete the training is not prohibitive.
- Training provider will submit student progress reports. This can be a formal written report or the students' progress can be discussed with Skills team staff via telephone or email. (Students will sign a release of information form with WIOA staff for this information to be shared).
- The training provider will collect the required Equal Opportunity (EO) data.
- Training providers must agree to following EO:
  - The organization should have an EO Officer or a staff person that deals with nondiscrimination and equal opportunity policies and regulations.
  - The Missouri Office of Workforce Development's "Equal Opportunity is the Law" poster should be posted in the facility.
  - Contract agreements should contain nondiscrimination and equal opportunity provisions.
  - Training providers should advertise to underserved populations.
  - The organization should have an accommodations policy.
  - Training providers must allow monitoring to ensure EO compliance, WIOA compliance and participant progress.
  - There should be a process for analyzing equal opportunity demographics for students that attend the institution. The following may be requested during an EO monitoring visit:
    - A copy of training program selection outcomes by demographics.
    - A copy of training programs graduation/completed outcomes by demographics.
    - A copy of training programs incomplete outcomes by demographics.
    - A copy of training programs placement wages outcomes by

demographics.

- Training providers should have a confidentiality policy including a process for collecting confidential information.
- Training providers should have a written complaint and grievance policy.

### **Approval Process**

1. Training providers ensure programs are on the State's ETPL.
2. Training providers may wait until an eligible participant selects them and the Job Center staff makes contact to initiate the local approval, or the training provider can call the staff and request local approval in advance of being selected by a WIOA participant.
3. Training providers must collect data on job placement of graduates of the program. This data must be available for review.
4. Training providers must collect data on the number that starts the program versus those that complete the program. This must be available for review.
5. Staff will notify the training provider of the program's local approval or advise on the corrective actions needed for approval. Programs denied approval can submit a request for another review at any time.

### **Eligibility Renewal and Termination Procedures**

- Programs will retain their local approval status for one year from the original approval.
- After one year the school will complete the process of the original approval for subsequent approval.
- If at any time staff determines the training provider is no longer adhering to the terms and expectations listed in this document, the approval will be revoked, and the training provider notified. The local area may grant a probationary period for corrective action before revoking the training provider/program for local approval.

The Jefferson/Franklin Consortium WDB agrees to:

- Perform initial local ETPL eligibility.
- Renew local ETPL eligibility of providers and programs.
- Terminate training providers due to poor performance or a violation of WIOA requirements.
- Work with the State to ensure the appropriate use of the ETPL, sufficient number and types of providers of training services are available.