



Programs That Work

Quality Assurance For Short-Term Occupational Programs

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Expanding Financial Aid: The Need For Reform

Postsecondary education is more important than ever in today's economy. Over the next decade, about 80 percent of job openings will require some form of postsecondary education or training.¹ One federal response to this emerging reality was passage of the Workforce Innovation and Opportunity Act (WIOA) in 2014. The law increased focus on helping participants obtain recognized postsecondary credentials, including certificates awarded by training providers for program completion and certifications awarded by industry associations or employers after passage of an exam. WIOA authorizes funding for short-term occupational training that may lead to a certificate or (often through non-credit courses) help students prepare for a certification exam.

However, the bulk of tuition support for our nation's working adults and low-income students comes not from WIOA, but from Pell Grants provided through federal financial aid policies in the Higher Education Act (HEA). Current WIOA Title I funding is about \$3 billion, as compared to more than \$6 billion of annual Pell Grant expenditures spent on occupational training.²

Federal financial aid policies have not been updated to reflect the changing needs of students and workers in a 21st century economy. Currently, eligibility for federal financial aid, even for short-term programs designed to lead to "gainful employment," is limited by HEA to programs of *at least* 600 clock hours. The failure of federal policies to account for the increased significance of short-term occupational training is due, in part, to limited agreement on how to verify whether such programs are both aligned with the needs of industry and of sufficient quality to justify federal aid.

States also are working to adjust their policies to account for evidence that short-term occupational programs can be a valuable entry into a good job, particularly for low-income workers.³ As many states strive to achieve postsecondary credential attainment goals, leaders want to know that they are supporting high-quality programs—not just any program resulting in a credential.

In order to ensure that our nation's workers are prepared to excel in high-demand jobs, policy experts should reach consensus about an appropriate quality assurance process for short-term occupational training programs. This consensus would allow lawmakers to be comfortable supporting these programs with public funds, students to be confident about selecting high-quality training, and employers to understand which programs are effectively preparing students for careers.



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Creating a New Quality Assurance Framework

There are several existing processes intended to provide federal and state policymakers with assurances regarding program quality for higher education and workforce training programs. This paper analyzes several of these processes based on seven criteria discussing whether the process is: (1) easy to use; (2) includes industry approval; (3) quickly adjustable; (4) federally recognized; (5) gives providers incentive to participate; (6) offers program-level approval; and (7) considers outcomes. Reviewing these varied quality assurance mechanisms illustrates that none meet all the criteria of an ideal process, and thus would be unlikely to be acceptable to policymakers as they expand financial aid to short-term occupational programs. Accreditation and state authorization, for example, do not include mechanisms for ensuring employer needs are met and have limited evaluation of outcomes.

However, there are lessons to be learned from this analysis. Federal

regulations for programs that lead to gainful employment require employment outcome metrics for Pell and WIOA eligibility. In addition, a number of states are experimenting with quality assurance processes that incorporate opportunities for direct employer input.

The following policy recommendations are informed by the review of existing quality assurance mechanisms, as well as input from dozens of workforce development experts from community colleges, state agencies, national advocacy groups, and community-based organizations. The recommendations attempt to satisfy the seven criteria used to assess existing processes, particularly use of outcome measurement and industry validation, because these are emerging as valued indicators of quality for occupational programs. Finally, the policies build on widely accepted minimum standards for quality, i.e. requiring minimum clock hours and institutional accreditation,

which will help to make them politically feasible.

The recommendations differ slightly for federal and state policy. For federal aid, the recommendations include simple criteria in recognition of limited capacity at the U.S. Department of Education (ED) to approve programs in a timely manner. The program eligibility requirements for state aid include additional indicators of quality to incentivize desired characteristics for short-term occupational programs, i.e. high credential attainment rates and effective models for serving individuals with barriers to employment. States have more capacity and flexibility to review a longer list of program criteria, as demonstrated by Virginia's credential approval process, so it is possible to impose more quality indicators. We also recommend more flexibility in clock hour requirements for state aid eligibility, in order to accommodate innovations in accelerated programs.

Policy Recommendations

1. Joint Federal and State Recommendations: Both federal and state policies should support high-quality short-term occupational programs that provide training for in-demand jobs and/or start people on a career pathway to a family-sustaining wage. Both federal and state financial aid policies should fund short-term programs that:

- Are offered by institutions eligible for Title IV funding, either for academic credit or as a non-credit program;⁴ and
- Comply with relevant state or federal regulations, such as WIOA eligible training provider reporting regulations; and
- Result in awards, certificates, or diplomas awarded based on completion of a program of study, or are designed to prepare students to pass qualifying exams for industry certifications or occupational licenses; and
- Demonstrate that direct employer engagement has affirmed programs are aligned with the competencies that employers need. Engagement should involve multiple employers, and may be demonstrated through participation in a national industry validation process (e.g. Manufacturing Skills Standard Council), a statewide employer engagement process (e.g. council focused on employers from high-demand industries), or regional sector partnerships; and
- Demonstrate that program completers who obtain the intended credential (certificate, certification, or license) have median wages of at least 200% of the federal poverty guideline for a one-person household and/or receive academic credit toward a credential related to an occupation with a median wage that meets this threshold.

2. Additional Federal Recommendations: Federal Pell Grants should be expanded to award funds for eligible short-term programs. Once authorized by Congress, ED should operationalize this new eligibility through a review process that requires institutions to apply and demonstrate that short-term programs meet the mandated conditions. ED would certify eligibility every three years. To qualify for federal aid, short-term programs would have to meet the criteria described in Recommendation 1 and:

- Include 150 to 600 clock hours over a period of at least 8 weeks.⁵

3. Additional State Recommendations: States should adopt policies that direct financial support, including state aid and federally-funded WIOA training vouchers, to students in short-term programs that provide training for in-demand skills and meet the standards listed below. When possible, states should align standards used for WIOA eligible training providers and programs offered by accredited institutions that qualify for state financial aid. Approval will be awarded for a period of two years to programs that:

- Include 150 to 600 clock hours;
- Demonstrate credential attainment rates equal or better than the minimum credential attainment threshold designated by the Governor for programs to qualify for the eligible training provider list under WIOA;
- Demonstrate commitment to serving individuals “with a barrier to employment” (as defined under WIOA) by implementing procedures for the identification, recruitment, and support of these individuals, and using disaggregated outcome data to address achievement gaps between these individuals and other program participants.



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Analysis of Existing Quality Assurance Processes

Scope of Analysis

This section provides an overview of existing processes for evaluating postsecondary and workforce training programs, including their strengths and weaknesses, and moves on to an analysis of state efforts to develop alternatives to existing models. It examines how each process aligns with seven criteria:

Easy to Use Any process should not be overly burdensome for education and training providers.

Incorporates Approval from Regional and Local Industry

If graduates of each program are to be employed, the programs must train employees for in-demand jobs and provide them with the skills necessary to succeed. The easiest way to learn what training will enable an employee to succeed is to ask regional and local employers. Thus, any successful system should have a process to obtain approval from employers so that programs can align with their preferences.

Quickly Adjustable In order to be effective, short-term programs need to be able to adjust frequently and quickly to adhere to labor market demand, ensuring that students are prepared for in-demand jobs. Processes to evaluate programs must allow programs to be approved quickly after making changes.

Federally recognized This criterion asks whether each process is one the federal government currently uses to determine eligibility for federal funding or other government benefits.

Incentive to Seek Validation Quality assurance processes only matter if they are used. Thus, systems should include some incentive that would compel the institution to seek recognition from that entity and make suggested programmatic changes.

Provides Program-Level Approval Program-level approval is essential for workforce training because outcomes for graduates of different programs within institutions can vary significantly. This information helps students select programs, and can provide program managers with the information they need for program improvement.

Considers Outcomes A key way of understanding whether programs are high quality are those program's outcomes, like graduation and employment rates, as well as post-graduation earnings. This information shows whether students are prepared to succeed in a changing economy. This criterion asks whether a quality assurance process considers a program's outcomes when evaluating that program, and whether a program with bad outcomes could fail the evaluation.

Existing Systems to Evaluate Academic Institutions and Programs

Because higher education is the pathway of choice for millions of Americans, and receives significant amounts of federal funding, there are several quality assurance mechanisms intended to gauge the quality of academic institutions and programs. These systems typically emphasize program inputs (such as clock hours), but seldom focus on alignment with employer need.

There are several quality assurance mechanisms intended to gauge the quality of academic institutions and programs.



Accreditation

Overview

One of the most notable ways of signaling quality in the postsecondary realm has been the accreditation system. The accreditation system creates standards for assessing institutions/programs and then monitors the institutions and programs to ensure that they meet those standards.

In the United States, accreditation is a decentralized system where higher education institutions voluntarily adhere to standards created by independent accrediting agencies. There are two types of accrediting agencies: institutional agencies that accredit entire institutions and specialized or programmatic agencies that accredit particular programs, departments within schools, or schools specializing in just one program. Many institutional accreditors are regional in scope, meaning they seek to accredit all of the schools in a particular region of the country. However, there are some national accreditors, who usually focus on accrediting for-profit schools. Specialized accreditors can be regional or national. The institutions and programs seeking accreditation fund the accrediting bodies through dues. The federal government has only an indirect role in the accreditation process; it “recognizes” accrediting agencies by periodically evaluating them and deeming that they are fit to evaluate schools.

Each accreditor uses different evaluation criteria. However, many accreditation reviews focus more heavily on inputs than outputs. According to the U.S. Department of Education (ED), relatively few accreditors use employment rates as a measure of student achievement.⁶ However, according to a white paper by Senator Lamar Alexander, “Components such as classroom facilities, faculty salaries and degrees, institutional finances and other non-educational related inputs are regularly mentioned during accreditation reviews. For example, a recent peer-review report recommended that the institution under review give greater ‘attention to the capacity of the library, in terms of personnel, collections, and facilities.’”⁷

Despite differing evaluation criteria, accrediting bodies all share similar processes. Each institution or program seeking accreditation volunteers to undergo a periodic review by the accrediting agency, usually every three to 10 years, to ensure that they meet the accrediting bodies’ standards. First, that institution or program will conduct a self-review against the accreditation standards. Then the accrediting agency will send a team of experts from peer institutions or programs to conduct a site visit. Finally, the accrediting agency will decide whether to grant accredited status. The accreditation agency will then publish a list of all accredited schools or programs, so that the public knows which schools or programs meet the agency’s criteria. Between periods of accreditation, the accrediting agency will usually monitor the institution to ensure that it continues to meet the agency’s standards.

ED reviews accrediting agencies at least every five years, to ensure that they meet 10 standards outlined in [Section 602.16](#) of Title 34 of the Code of Federal Regulations. Evaluations are conducted by the National Advisory Committee on Institutional Quality and Integrity (NACIQI), which then advises ED as to whether it should recognize the agency. NACIQI is composed of representatives from education, the business community, and the government or the public. Schools have to be accredited by federally-recognized accreditors to receive federal financial aid dollars, so the recognition process is how the federal government attempts to ensure federal funds are spent appropriately.

Alignment with Priority Criteria

Easy to Use Accreditation can be costly and burdensome for higher education institutions, who often have to produce “reams of paperwork and documentation” to demonstrate compliance with the accreditor’s standards.⁸ Some colleges even need to hire a full-time staff member to compile the documentation. Vanderbilt University’s College of Arts and Sciences reports spending over 5,000 hours on accreditation-related work. Duke University has spent about \$1.5 million for its most recent accreditation review, and over \$500,000 annually to stay in compliance.

Incorporates Approval from Regional and Local Industry There is no evidence that most accrediting agencies solicit any input from employers. In fact, there is a well-known disconnect between higher education and employers. Ninety-six percent of chief academic officers at higher education institutions believe that their institutions are very or somewhat effective at preparing students

for work.⁹ However, in a separate Gallup survey of employers, just over one-third believe that “higher education institutions in this country are graduating students with the skills and competences that my business needs.”¹⁰

Quickly Adjustable The accreditation process is notoriously slow. Schools are only evaluated every three to ten years. The timeframe for the evaluation process can range amongst accreditors, and amongst schools depending upon a number of factors, including how long the institution has been in operation or how well an institution or program aligns with the agency’s standards. Although timeframes can vary, regional accreditation from the Middle States Commission on Higher Education can take at least two years. Program accreditation from the American Psychological Association takes about 18 months.

Federally recognized The federal government has long relied upon accreditation to determine eligibility for federal financial aid dollars.

Incentive to Seek Validation Although participation in accreditation is voluntary, schools have strong motivation to go through the accreditation process. Students who attend an unaccredited school cannot receive federal student aid—valued at over \$140 billion a year.¹¹ Because federal student aid can account for a significant portion of many institutions’ budgets, “for a college or university to lose accreditation would be a devastating and perhaps fatal blow,” according to the American Council of Trustees and Alumni.¹² Additionally, students may hesitate to attend an unaccredited school because they may not be eligible for a professional license.

Provides Program-Level Approval The accreditation system has processes for evaluating institutions as well as specific programs.

Considers Outcomes As described above, many accreditation reviews focus more heavily on inputs, such as classroom facilities, than on outputs, such as graduation or employment rates.



Quality Assurance Criteria: **Accreditation**

	Yes	No	Varies
Easy to Use		X	
Industry Approval		X	
Quickly Adjustable		X	
Federally Recognized	X		
Incentive to Seek Validation	X		
Program Level Approval	X		
Considers Outcomes			X

State Authorization of Postsecondary Institutions

Overview

Another method of evaluating academic institutions and programs is the process of State Authorization. In order to be eligible to receive Federal Student Aid under Title IV of the Higher Education Act (HEA), the statute and [34 C.F.R. 600.9](#) require that (1) a state authorize an institution physically located within that state to provide a postsecondary education program, and (2) a state has a process to review and act upon complaints regarding that institution. There are, essentially, two methods by which a state can authorize an institution. First, a state can authorize a school so long as the state (1) established the institution, by name, as an educational institution through a constitutional provision, statute, charter, or other action; and (2) determined that the school complies with state licensing requirements, which may be waived if the school is accredited or has been operating for at least 20 years. Second, a state can establish a school if it (1) has passed the state's process for authorization; and (2) has complied with the state's licensing requirements (which cannot be waived because of accreditation or years in operation). Although authorization standards already existed in many states before the federal legislation and regulation, many claim these changes were the first time some institutions became aware of the requirements.¹³

Authorization varies significantly by state. Notably, each state has different requirements for an institution to obtain authorization. Some states require only institutions with physical presence in their state to obtain authorization (of course, states define physical presence differently), while others may also require any institution who enrolls a resident of that state in an online course to obtain authorization. Furthermore, some states require authorization for both institutions and programs, while other states require authorization for only one or the other.

Additionally, each state has different criteria for authorization of higher education institutions. Some states may only need documentation that a college is accredited, while others "are expected to comply with numerous requirements and to report extensive data regarding institutional finances, enrollment figures, and activities related to admission criteria and outcomes for" on-campus programs.¹⁴

Procedures vary as well, with some states having lengthy and costly processes, and others being relatively quick and affordable. As of 2014, institutions reportedly had to wait between two months and two years to receive state authorization.¹⁵ Fees associated with state authorization reportedly vary from \$0-\$10,000+.¹⁶ Furthermore, both the criteria and processes may vary depending upon the type of institution or program applying for state authorization.

Some states require authorization for both institutions and programs, while other states require authorization for only one or the other.

Alignment with Priority Criteria

Easy to Use Because the state authorization process varies significantly from state to state, many institutions find the process confusing. Some institutions do not know which states they need authorization from, and may not understand the criteria they will be judged upon or the process they will undergo. However, several states do make clear summaries of their evaluation criteria and processes available online.

Incorporates Approval from Regional and Local Industry

It is unclear whether the majority of states incorporate approval from regional and local industry. However, some states require proof that a program is valuable to employers, even if that proof falls short of industry approval. For example, one of Ohio’s program approval criteria requires “evidence of workforce relevance,” which can include labor market research or “evidence of partnerships with business and industry.”¹⁷ Likewise, Virginia pays attention to whether a program “fill[s] demonstrable employer needs in the state.”¹⁸

Quickly Adjustable The timeframe for state approval processes varies dramatically. As of 2014, institutions reportedly had to wait between two months and two years to complete state approval processes. Accordingly, some states may have processes that allow for fast changes, while others may not.

Federally Recognized As with accreditation, the federal government relies upon state authorization to determine eligibility for federal financial aid dollars. In order to receive federal aid, institutions must be authorized by the state in which they are located.

Incentive to Seek Validation

Institutions have numerous reasons to comply with state approval. First, as with accreditation, the inability to receive federal financial aid can be crippling for an educational institution. Additionally, states can impose a number of sanctions upon institutions who do not comply. Penalties can include cease and desist letters and fines.

Provides Program-Level Approval

Although states vary, most states require approval for programs. As of 2012, 31 state agencies required approval for both institutions and programs, while 10 required approval for just programs, and 12 required authorization for just institutions.¹⁹

Considers Outcomes As mentioned above, the criteria for state authorization vary wildly, and not all institutions are evaluated based on outcomes. According to an American Enterprise Institute survey of regulatory documents from state authorizing agencies, 26 of 69 agencies require outcomes information during the initial application for state authorization, and 35 out of 69 agencies require outcomes data during reauthorization.²⁰

Gainful Employment Regulation

Overview

In order to qualify for federal student aid, the Higher Education Act (HEA) requires that most for-profit programs, as well as some certificate programs at private non-profit and public institutions, prepare students for “gainful employment in a recognized occupation.” The rule is designed to prevent students from using federal aid to enroll in programs that will leave them saddled with more debt than they will realistically be able to pay back.

Under regulations promulgated by ED in 2014, and which took effect in July 2015, in order for a program to prepare students for gainful employment, graduates’ annual loan payments must be less than 8 percent of their total earnings or 20 percent of their discretionary earnings. Programs can lose federal aid eligibility if graduates’ average loan repayments exceed 12 percent of total earnings or 30 percent of discretionary income for two years in a three-year period. A program can also lose eligibility if it spends four consecutive years in the “gray zone” between passing and failing—meaning graduates have annual loan repayments between 8-12 percent of total earnings or 20-30 percent of discretionary earnings.

ED will calculate these metrics. In order to do this, institutions must provide ED with data about each of their gainful employment programs, as well as the students receiving federal aid who enrolled in those programs.

Once institutions submit their data, ED will provide institutions with a Draft Student Completer List, which identifies the students whose outcomes will be measured against the gainful employment metrics. Institutions then have 45 days to challenge the accuracy of those lists. Once ED has a complete list it will determine if a program is preparing students for gainful employment by matching its data on federal aid recipients with

Quality Assurance Criteria: State Authorization

	Yes	No	Varies
Easy to Use			X
Industry Approval			X
Quickly Adjustable			X
Federally Recognized	X		
Incentive to Seek Validation	X		
Program Level Approval	X		
Considers Outcomes			X

employment data from the Social Security Administration in order to identify graduates' earnings. ED will combine this earnings data with information on student debt to calculate a debt-to-earnings ratio. Once released, institutions may challenge these determinations.

Institutions must issue warnings to students if, based on these calculations, the program could become ineligible for federal aid at the end of the year.

Alignment with Priority Criteria

Easy to Use Because most institutions have only just begun to submit data to comply with the gainful employment regulation, there is a learning curve. However, there is no evidence that this submission will be particularly burdensome in the long term. Still, compliance may be costly for institutions. One researcher estimates it could cost colleges, on average, \$51.55 per student to comply.²¹

Incorporates Approval from Regional and Local Industry The gainful employment regulations do not incorporate any direct approval from regional or local industry.

Quickly Adjustable This criteria functions differently regarding gainful employment regulation than it does for the other quality control mechanisms discussed in this paper, because institutions do not immediately “fail” after just one evaluation. Given that an institution’s metrics must fail for two out of three years, or be on the brink of failing for four years in order to lose federal aid eligibility, institutions do have time to adjust. Accordingly, this process does enable programs to adjust frequently.

Federally Recognized Although the federal government itself serves as the evaluator, this process is relied upon to determine eligibility for federal funding.

Quality Assurance Criteria: Gainful Employment

	Yes	No	Varies
Easy to Use	X		
Industry Approval		X	
Quickly Adjustable	X		
Federally Recognized	X		
Incentive to Seek Validation	X		
Program Level Approval	X		
Considers Outcomes	X		



Incentive to Seek Validation Like with accreditation, programs that do not meet ED’s gainful employment metrics are not eligible to receive federal financial aid. Because this is a significant part of most institutions’ budgets, programs will be motivated to comply with this regulation.

Provides Program-Level Approval Gainful employment regulation determines whether specific programs, not institutions as a whole, prepare students for gainful employment.

Considers Outcomes Gainful employment regulations consider wage outcomes.

Existing Systems to Evaluate Workforce Training Programs

Like academic programs, workforce training programs are also subject to a number of quality assurance evaluations. However, unlike the processes intended to evaluate academic programs, these processes tend to place much more emphasis on industry needs.

Registered Apprenticeship

Overview

Apprenticeships combine on-the-job training and related classroom instruction, enabling participants to learn the skills certain employers need. Registered Apprenticeship programs enable participants to earn a nationally recognized certificate of completion representing occupational proficiency.

Creating Registered Apprenticeship programs often involves three roles—the employer providing on-the-job training, the entity providing the related instruction (usually an academic institution, but sometimes the employer itself), and the “sponsor” administering the program (often an industry association or community-based organization, but sometimes the employer or academic institution). In order to

create an apprenticeship program, these stakeholders must come together to determine what skills apprentices should learn over the course of the program. Once identified, the stakeholders can determine the type of on-the-job training to be provided and create a curriculum for the related instruction.

Programs can be time-based, competency based, or a hybrid. Time-based programs require apprentices to complete a certain number of hours of on-the-job training and related instruction. Competency based programs do not have a time requirement, but instead require apprentices to demonstrate a mastery of the specified skills, often by passing a test. The hybrid approach usually requires apprentices to demonstrate a mastery of the specified skills within a range of hours.

To become a Registered Apprenticeship program, the U.S. Department of Labor, or a State Apprenticeship Agency designated by the Department of Labor to evaluate programs, must certify that the program has met national standards. The U.S. Department of Labor directly registers apprenticeship programs in 25 states, while State Apprenticeship Agencies register programs in the other 25 states and the District of Columbia.²²

Apprenticeships combine on-the-job training and related classroom instruction, enabling participants to learn the skills certain employers need.

In order to be registered, a program must (1) meet program standards; (2) train apprentices in an “apprenticeable” occupation; and (3) conform to the Department of Labor’s regulation on Equal Employment Opportunity in apprenticeship and training.

There are 23 federally required program standards outlined in [29 CFR 29.5](#). Some of the standards a program must meet include: (1) outlining processes for on-the-job training and related instruction; (2) creating an approved type of apprenticeship program (time-based, competency-based, or hybrid), (3) the provision of an entry wage meeting legal minimum wage requirements, and progressively increasing wages as the apprentice gains skills; (4) provision for periodic apprentice performance reviews; (5) a ratio of apprentices to journeyworks “consistent with proper supervision, training, safety, and continuity of employment” and language in collective bargaining agreements; (6) assurance of qualified trainers and adequate supervision on the job; and (7) safe equipment and facilities and safety training for apprentices.²³

The requirements for “apprenticeable” occupations are outlined in [29 CFR 29.4](#). It requires the occupation to (1) involve skills learned “through a structured, systematic program of on-the-job supervised learning;” (2) “be clearly identified and commonly recognized throughout the industry;” (3) involve attainment of skills and knowledge that, according to industry standards, would take at least 2,000 hours



Quality Assurance Criteria: Registered Apprenticeship

	Yes	No	Varies
Easy to Use			X
Industry Approval	X		
Quickly Adjustable		X	
Federally Recognized	X		
Incentive to Seek Validation			X
Program Level Approval	X		
Considers Outcomes			X

to obtain; and (4) require related instruction.²⁴ There are over 950 such occupations recognized by the Department of Labor.²⁵

Equal Employment Opportunity guidelines are outlined in [29 CFR 30](#). In part, these rules forbid discrimination in the recruitment, selection, employment, and training of apprentices because of their “race, color, religion, national origin, or sex,” and require program sponsors to create and follow affirmative action plans to actively identify, recruit, train and motivate present and potential female and minority apprentices.²⁶

The process for approval can vary between the Department of Labor and State Apprenticeship Agencies. However, generally speaking, programs seeking registration can submit documents showing compliance with the aforementioned laws to the requisite agency. Some agencies will meet with program sponsors before submission to outline program requirements and help fill out forms. The time needed for evaluation may vary.

According to federal law, programs seeking registration will be reviewed by the relevant agency at least three times. Initially, programs meeting required standards are given provisional approval for one year. After one year, programs are reevaluated to ensure they are of sufficient quality and continue to meet program requirements. Conforming programs may be granted permanent registration, or can

maintain provisional approval through “the first full training cycle.”²⁷ Full training cycles can last from one to six years, but the majority last for four years. All programs are once again reviewed at the end of the first full program cycle. Programs receiving satisfactory reviews will become permanently registered. Once registered, programs must be reviewed “no less frequently than every five years.” Programs not conforming to regulations may be recommended for deregistration.

Alignment with Priority Criteria

Easy to Use The ease of use may vary between states. Some employers have complained that the process for registering apprenticeship programs can be overly bureaucratic and time consuming. There is anecdotal evidence that some employers have withdrawn their applications because the process took over a year. That said, some states, like South Carolina, reportedly review programs within a day. Furthermore, the Department of Labor produces a guide for building Registered Apprenticeship programs, and agency staff at some registration agencies may guide program sponsors through the process, to minimize the difficulty of registration.

Incorporates Approval from Regional and Local Industry Registered Apprenticeship programs are not approved by regional and local industry, but they are created by employers.

Accordingly, these programs are specifically tailored to employer needs.

Quickly Adjustable Registered Apprenticeship programs are initially reevaluated after one year, and subsequently re-evaluated after the first full training cycle – often about four years after the program begins training apprentices. After that, Registered Apprenticeship programs are reevaluated at least every five years. While initial evaluation may recognize program improvements in a timely manner, subsequent reevaluations may not.

Federally Recognized

The Department of Labor relies on its Office of Apprenticeship and the State Apprenticeship Agencies to determine registration, and hence for making programs eligible for Registered Apprenticeship benefits, such as tax credits.

Incentive to Seek Validation

The Department of Labor and State Apprenticeship Agencies do not impose sanctions upon programs that fail the registration process. However, once registered, apprenticeship programs can receive technical assistance, tax credits, and federal resources, including funding. Some program sponsors may find these benefits compelling, while others may not.

Provides Program-Level Approval

Evaluators review individual Registered Apprenticeship programs.

Considers Outcomes Although apprenticeship programs do monitor some apprentice outcomes (like completion), the initial and subsequent evaluation of apprenticeship programs are primarily based upon whether the programs meet the aforementioned process requirements. Some state apprenticeship agencies may review apprentice outcomes in order to discipline certain programs, but rarely de-register a program on these grounds.

Eligible Training Provider List

Overview

Section 122 of WIOA requires states to publish lists of training providers which are eligible to receive WIOA funds intended for training services, referred to as Eligible Training Provider Lists (ETPLs). The purpose of these lists is to allow customers to make informed decisions about training programs by displaying information about training providers, their services, and their program quality.

In order to get a training program onto the list, a training provider must be one of three types of eligible entities: (1) higher education institutions providing programs that lead to recognized postsecondary credentials; (2) registered apprenticeship programs; or (3) “public or private provider[s] of a program of training services.”²⁸ In addition, all eligible entities (except registered apprenticeship providers) must (1) undergo a state defined application procedure; and (2) have programs that meet state defined eligibility criteria.

Under WIOA, state governors are tasked with creating initial eligibility procedures, as well as subsequent review and renewal procedures. However, state governors are afforded significant flexibility. According to the law, procedures must only identify the roles of the state and local areas in receiving, reviewing, and evaluating applications. Accordingly, state procedures to apply for placement on the ETPL may vary. Although there is no compilation of state practices, some experts report that some states require local areas to conduct initial reviews, while other states require the state to conduct initial reviews.²⁹

Initial eligibility for any given program may only last for one fiscal year. After that year, the training provider must undergo another review process. Once approved under that review process, eligibility must be reviewed every two years thereafter. States must also create procedures for

providers to appeal decisions to remove them from the ETPL.

Like with procedures for ETPL eligibility, state eligibility criteria and levels of performance on those criteria may vary because state governors are afforded significant flexibility. The law only mandates that the criteria include elements related to (1) WIOA’s core performance metrics; (2) partnership with businesses; (3) indicators of high quality training; and (4) alignment with in-demand industries. Local boards may require additional criteria, or may “require higher levels of performance” than the state’s governor.³⁰ Unfortunately, it is difficult to identify what elements each state requires, or how many local boards have additional criteria or higher standards than their states.

Nevertheless, once on the list, providers must submit data to the state about all students in the program, not just those funded by WIOA. However, WIOA provides governors relative flexibility regarding what data they require programs to submit. The law only requires the submission of data on (1) performance respective to WIOA’s core measures; (2) the percent of participants employed in an occupation related to their training program; (3) recognized postsecondary credential attainment; (4) costs of attendance; (5) program completion rates; and (6) anything else needed to evaluate adherence to the state’s eligibility criteria. Local boards may

require additional data submission. As with eligibility criteria, it is unclear what data states or local boards will require.

Alignment with Priority Criteria

Easy to Use The process for providers to apply for inclusion of their programs on the ETPL varies, as this may depend upon the type of program sponsored by the provider, whether the application is for initial or subsequent eligibility, as well as the number of locations a provider is seeking inclusion on the ETPL. Under WIOA, apprenticeship programs are automatically eligible for the ETPL, and so, at least for those providers, the ETPL process is very easy to use.³¹ Other types of providers may have more difficulty, particularly in regards to subsequent eligibility. Texas saw a significant reduction in the number of providers on the ETPL after it began the subsequent approval process, many of the drop-outs citing an unwillingness to gather and submit performance data.³² Furthermore, some providers seeking inclusion on a number of state and local ETPLs may find the application process confusing or repetitive. Initial and subsequent application processes can vary not just between states, but sometimes on the local level. While some states may have centralized application processes, others may require providers to submit applications to each local workforce board from which they seek approval. Providers applying for inclusion on multiple lists

Quality Assurance Criteria: Eligible Training Provider List

	Yes	No	Varies
Easy to Use			X
Industry Approval			X
Quickly Adjustable			X
Federally Recognized	X		
Incentive to Seek Validation			X
Program Level Approval	X		
Considers Outcomes	X		

may need to look up the process for each state, and possibly each local area.

Incorporates Approval from Regional and Local Industry It is unclear whether most states incorporate approval from regional and local industry into their ETPL eligibility requirements. However, the process does incorporate some degree of employer engagement. WIOA requires states to consider the degree to which programs applying for the ETPL “relate to in-demand industry sectors and occupations in the State,” and the degree to which providers have partnerships with businesses.³³

Quickly Adjustable After initial placement on the ETPL, states must reevaluate placement after one year. Subsequently, however, WIOA only requires programs to seek renewal every two years. Although reevaluation after initial placement may recognize program improvements in a timely manner, subsequent reevaluations may not.

Federally Recognized The federal government has traditionally relied upon states and local workforce boards to determine whether workforce training programs should receive federal WIOA funding.

Incentive to Seek Validation As with accreditation and state authorization, institutions lose access to some federal funds if they are not on the ETPL. However, WIOA funds may make up only a small portion of revenue at many community colleges, so not all potential training providers are incentivized to participate in the ETPL process.

Provides Program-Level Approval The ETPL system requires institutions to seek approval for each of their programs.

Considers Outcomes The ETPL system considers outcomes. WIOA requires a state’s Governor to take into account training provider performance on WIOA’s core measures, as well as any other outcome measures the Governor determines are appropriate.³⁴



Industry Driven Mechanisms

Unlike quality assurance processes that evaluate academic or workforce training programs, usually in order to determine eligibility for federal funding or assistance, some industry clusters have taken the lead in approving training programs for potential future workers. Below is the most notable example of industry approval.

Manufacturing Skill Standards Council

Overview

The Manufacturing Skill Standards Council (MSSC) has created industry-defined standards for manufacturing skills, as well as a training, assessment, and certification system, in order to approve training programs for potential workers.

The MSSC began as a “voluntary partnership” of relevant stakeholders, including more than 700 companies, 4,000 workers, representatives of organized labor, and educators. These stakeholders came together to produce standards describing the skills and work-related functions a worker would need in order to be successful in manufacturing.

The Manufacturing Skill Standards Council has created industry-defined standards for manufacturing skills, as well as a training, assessment, and certification system, in order to approve training programs for potential workers.

Currently, MSSC convenes meetings of national subject matter experts to update these standards annually in order to reflect modern best practices. These experts have five or more years of “direct industry or industrial training experience in manufacturing and/or logistics” as well as “direct knowledge of the experience and qualifications for frontline workers in their respective fields.”³⁵

MSSC also offers two training and certification programs that adhere to these standards. In order to offer one of these courses, an institution (often a community college or a career and technical education center) need only enroll an instructor in the instructor training course and have that instructor obtain a certificate saying they passed the program they plan to instruct. Instructors can then use teaching materials (including textbooks and PowerPoints) provided by MSSC to teach the course.

Students can take courses online, or in a blended environment (part in-person and part on-line). Tests are given at authorized centers, and students who pass the tests are awarded a certificate. Students who pass all the modules in one of the two proscribed areas receive a certification. Certification holders



Quality Assurance Criteria: Manufacturing Skill Standards Council

	Yes	No	Varies
Easy to Use	X		
Industry Approval	X		
Quickly Adjustable	X		
Federally Recognized		X	
Incentive to Seek Validation			X
Program Level Approval	X		
Considers Outcomes		X	

are required to get re-certified every five years. MSSC sends test takers’ their scores and diagnostic reports about their progress after every test, and will send test scores to employers with the test taker’s permission. In addition, MSSC sends employers a “diagnostic tool” showing the strengths and weaknesses of at least 10 test takers.

Alignment with Priority Criteria

Easy to Use It is relatively easy to offer an MSSC course. As described above, an institution interested in offering the course needs only to get an instructor authorized. An instructor is authorized if they complete the instructor course and obtain a credential for the module they want to teach.

Incorporates Approval from Regional and Local Industry MSSC’s standards and certifications are entirely industry led. The expert panels that annually review the standards are composed of persons with at least five years of industry experience. Courses required to obtain certifications are later aligned with these standards.

Quickly Adjustable MSSC’s standards, upon which they base courses and certifications, are reviewed annually to ensure that they align with modern best practices. This timeframe seems to enable frequent adjustment.

Federally Recognized MSSC has not traditionally been used to determine if federal funding is being spent appropriately.

Incentive to Seek Validation

In theory, many institutions are eager to please employers because it helps to ensure that their students receive employment after program completion. Furthermore, because MSSC provides all program materials, there is little reason an instructor would veer from the provided materials. However, there are no financial or legal factors that might compel institutions to make MSSC suggested programmatic changes.

Provides Program-Level Approval

MSSC’s credentials are awarded for individual courses and series of courses, and do not apply to institutions as a whole.

Considers Outcomes

Although MSSC measures student outcomes on certification tests, it does not consider student outcomes when determining whether or not an institution may offer an MSSC program. As described above, the only requirement for an institution to offer an MSSC program is a certified instructor.

State-Based Efforts for Quality Assurance

In addition to the quality assurance processes described above, some states have created their own mechanisms for engaging industry and validating education/training programs and their resulting credentials. Two notable efforts are described below.

Virginia's Industry Credentials List

Virginia has created a process by which it evaluates short-term programs designed to prepare students for certifications awarded by industry (e.g. employers, trade associations) and occupational licenses awarded by state agencies. This process warrants particular attention from policymakers considering methods for assuring the quality of short-term programs.

The Virginia Community College System's (VCCS) strategic plan, Complete 2021, aims to triple the number of credentials awarded by 2021. State leaders do not want to incentivize the creation of meaningless credentials by allowing any credential to count toward this goal. Accordingly, the state has grappled with how to determine what credentials should count. As part of this effort, VCCS has begun to keep a list of its college programs resulting in a certification or

license. To see the list, please visit: <http://www.vccs.edu/workforce/industry-credentials/>. Each of the programs on this list must meet the following parameters: (1) be based on skills standards developed or endorsed by employers; (2) be recognized by multiple employers and educational institutions, as well as across geographic areas, where appropriate; (3) involve a test or other demonstration that the student has acquired the required skills; and (4) be validated by a third party, such as the American Welding Society, the National Healthcareer Association, or the Virginia Department of Health Professions. In addition, training programs may be taken for academic credit or non-credit. The VCCS is focusing attention on articulating approved credentials for credit and building stackable career pathways that incorporate these credentials.

For a credential to be approved and placed on the VCCS list there are four steps: (1) submission; (2) committee review against the approved industry parameters and recommendation; (3) college panel review and recommendation, as needed; and (4) final decision by the Chancellor or designees. First, the community college must submit its industry certification to VCCS, through the VCCS Industry credentials website. Each submission must include: (1) the credential's name; (2)

Some states have created their own mechanisms for engaging industry and validating education/training programs and their resulting credentials.

the awarding entity; (3) a contact e-mail; (4) whether the credential is offered for credit, not for credit, or both; (5) and the "cluster" the credential falls into, such as manufacturing or information technology.

The review step takes about three weeks and may involve two separate entities: the VCCS System Office Review Committee alone, or the VCCS System Office Review Committee and a group of secondary evaluators. The secondary evaluators are composed of four college workforce leaders (selected from a pre-identified pool) and four representatives from the Academic and Student Affairs Council (ASAC). The ASAC representatives must not be from the college who submitted the credential. In the first part of the review process, the VCCS System Office Review Committee will review the submission. If the submission "has national stature or clearly meets the SBCC approved industry parameters, the committee may recommend approval."³⁶ If a certification does not clearly meet the parameters, the committee will forward the request to the secondary evaluators. These secondary evaluators will then "reach out to content experts at their institution and in the field for additional industry knowledge" necessary to determine if the credential meets the parameters.³⁷ Ultimately, the

Quality Assurance Criteria: Virginia's Industry Credential List

	Yes	No	Varies
Easy to Use	X		
Industry Approval	X		
Quickly Adjustable	X		
Federally Recognized		X	
Incentive to Seek Validation			X
Program Level Approval	X		
Considers Outcomes		X	



VCCS System Office Review Committee will make a recommendation for approval or rejection to the Chancellor or his designees. If the Chancellor or his designees approve the credential, the certification or license will be posted to the website and the community college will be notified.

Credentials must be re-reviewed at least once every two years.

Alignment with Priority Criteria

Easy to Use Virginia's process is very simple for institutions as applicants need only answer four questions. A VCCS official estimates that it takes institutions only a few minutes to submit a new credential in the online system.

Incorporates Approval from Regional and Local Industry Virginia's process incorporates industry input because colleges only submit industry recognized credentials they offer in response to business and student demand. VCCS may also validate that a credential is "industry recognized" by reaching out to industry experts, searching for credential titles in job postings, or by talking to faculty experts with knowledge of a particular regional or local industry.

Quickly Adjustable The VCCS recently began a process of re-reviewing each

of the approved industry credentials to ensure currency and validity. Each credential is slated to be reviewed at least once every two years. However, VCCS may also re-evaluate a credential upon a community college's request.

Federally Recognized The federal government has not traditionally relied upon VCCS to determine eligibility for federal financial aid.

Incentive to Seek Validation

Primarily, community colleges seek inclusion for their programs in order to measure their progress towards achieving VCCS's strategic plan, Complete 2021, which aims to triple the number of credentials awarded by 2021. However, there are no formal sanctions for colleges whose programs do not obtain industry approval.

Provides Program-Level Approval

VCCS's list includes programs leading to individual certifications, not entire institutions.

Considers Outcomes Although meeting certain standards on student employment/wage outcomes is not a specific parameter required for a program to be placed on the list, VCCS does collect evidence of credential attainment and is beginning to evaluate subsequent labor market outcomes.³⁸

Tennessee's Employer Engagement

Overview

Sector partnerships (also called industry partnerships) may provide a framework to supplement quality assurance processes with a method for incorporating industry feedback.³⁹ Because these partnerships bring together all relevant stakeholders, they enable educational institutions to provide students with the skills industry needs.

Sector partnerships "convene multiple employers with education, training, labor, and community-based organizations to address the local skill needs of a particular industry."⁴⁰ These partnerships enable the assessment of local industry workforce needs, so that institutions may create or refine their education and training programs to match area needs.

A key feature of sector partnerships is that each is different, because they are tailored to a particular area and particular industry. However, many sector partnerships function similarly. Sector partnerships are often convened by an organization, such as a chamber of commerce or community-based organization that will find funding and staff the partnerships activities. Membership must include local employers from a given industry and may include education and training providers,

government agencies, philanthropists, and community-based organizations.

Typically, a sector partnership will begin by analyzing the local industry's current and future skills needs, and identify potential skills gaps (where there will not be enough trained workers for the available jobs). Once identified, they will create plans to close those skills gaps. These plans may include creating common skills standards, building career pathways, or creating or adjusting education and training programs. Although only 21 states have policies promoting sector partnerships, this number will soon expand. WIOA makes sector partnerships a required strategy and requires states to use a portion of their discretionary funds to support these activities.

States looking to implement sector partnerships to evaluate industry credentials may seek guidance from Tennessee, which has robust sector partnerships, two of which will be discussed here. These sector partnerships have enabled Tennessee to foster a skilled workforce that meets employers' needs.

One sector partnership in Tennessee is the Middle Tennessee Regional Workforce Alliance, a partnership between the Nashville Area Chamber of Commerce,

Middle Tennessee's Workforce Investment Boards, the Tennessee Board of Regents, and the area's community and applied technology colleges. The partnership governs regional "skills panels" intended to: (1) identify the skills and competencies needed by regional employers; (2) articulate those needs; (3) recommend ways to close the skills gaps; and (4) assess the value of that work. These skills panels are chaired by local business leaders facing a shortage of skilled workers in their industries, and also include members from the local workforce system and postsecondary education institutions. There are panels in Healthcare, IT, and Advanced Manufacturing, sectors vital to Middle Tennessee's economy. As a result of the panels, area community colleges have implemented unified curriculums in these areas, tailored to employer demand.

A second program, entitled the Tennessee Labor Education Alignment Program (LEAP), is modeled, in part, upon Nashville's skills panels. The program was established through legislation ([Public Chapter 338](#)), and provided ten million dollars to 12 local programs intended to "identify regional workforce needs and establish pipelines of trained job candidates."⁴¹ Specifically, the grants were awarded to partnerships that were seeking to "enhance, expand or create an academic program at an institution of higher education that fills a critical, demonstrable local workforce need," or to "acquire equipment for a higher education institution or industry education facility that is crucial to the development or enhancement of new workforce-essential competencies."⁴² Each partnership had to include representatives of a local economic development agency, K-12 schools providing "early postsecondary opportunities," local businesses, and higher education institutions.⁴³

One LEAP-funded project is the "Filling the Gaps Between Industry and Employees with Manufacturing Technology" project. South Central Tennessee has a demonstrated need

for "maintenance technicians with competencies in basic electricity, motors, mechanical drives, hydraulics and pneumatics, programmable logic action controllers, and robotics."⁴⁴ Accordingly, LEAP funds enabled the Tennessee College of Applied Technology - Shelbyville to offer its Industrial Maintenance program at four branch facilities across the region. In total, 80 more students were able to enroll in this program at the new facilities. Graduates may be offered an entry level position, or may earn 30 credits towards an Associate of Applied Science degree from Motlow State Community College. A second LEAP-funded project, the "Regional Apprenticeship Preparedness Program" (RAPP), has created dual enrollment and dual credit manufacturing courses in local high schools, enabling students to prepare for a career in manufacturing. As these programs demonstrate, sector partnerships are a relatively simple way to ensure that programs are recognized by industry.

Alignment with Priority Criteria

Easy to Use Typically, institutions do not have to apply to become involved with a sector partnership, and need only listen to the partnership's requests. Accordingly, they are fairly simple to use from an institutional perspective.

Incorporates Approval from Regional and Local Industry

By nature, sector partnerships incorporate feedback from regional and local industry.

Quickly Adjustable

Sector partnerships are fairly flexible, and can convene at the request of the organizing entity. As such, the programs involved with sector partnerships can quickly adapt to employer need.

Federally Recognized The federal government has not traditionally relied upon sector partnerships to determine eligibility for federal funds.



Because these partnerships bring together all relevant stakeholders, they enable educational institutions to provide students with the skills industry needs.

Quality Assurance Criteria:
Tennessee's Employer Engagement

	Yes	No	Varies
Easy to Use	X		
Industry Approval	X		
Quickly Adjustable	X		
Federally Recognized		X	
Incentive to Seek Validation			X
Program Level Approval	X		
Considers Outcomes			X

Primarily, institutions and programs participate in sector partnerships in order to adhere to regional and local industry demand and **ensure their graduates receive jobs**

Incentive to Seek Validation

Primarily, institutions and programs participate in sector partnerships in order to adhere to regional and local industry demand and ensure their graduates receive jobs. However, there are no formal benefits for participants, nor are there formal sanctions for those who do not participate.

Provides Program-Level Approval

Sector partnerships typically work to ensure that individual programs prepare students to meet the needs of regional and local industry.

Considers Outcomes Sector partnerships vary as to whether they engage in any quality assurance evaluations, and if they do, as to whether they consider student outcomes.



Endnotes

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