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Employment and Training Administration**

**How States Manage Eligible Training Provider Lists:
Findings from a State Survey**

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EXECUTIVE SUMMARY

A primary objective of the Workforce Investment Act of 1998 (WIA) is to improve the training options available to adult and dislocated workers. Previously, individuals eligible to receive federal training funds were constrained in their training options. They could often use these funds only for programs whose providers had contracts with local One-Stop centers. To increase the number of available program options, WIA instituted a market-based voucher system in which training customers can use federal funds to pay for training programs included on a state-approved list, known as the Eligible Training Provider List (ETPL).

To ensure that customers are using federal funds for high-quality programs that will help them obtain a job in an in-demand field, WIA requires training providers to have their programs reviewed and approved to be included on the ETPL. Additionally, to help customers make informed choices about which programs best suit their needs, WIA requires the collection and reporting of program information such as cost and performance. While WIA provides a basic structure for these processes, states and local workforce investment boards (WIBs) have a great deal of flexibility in implementing ETPLs. Because of this flexibility, state ETPL policies and practices vary throughout the country.

Limited information is available on the variety of ETPL practices, requirements, and policies and on how states are administering and managing their ETPLs. Although researchers have examined these dynamics through case studies in a small number of states, a more comprehensive understanding requires a systematic overview across states.

IMPAQ International, LLC (IMPAQ) fielded the web-based ETPL Coordinator Survey in all states, the District of Columbia, and Puerto Rico to examine ETPL policies and practices throughout the United States. Forty-six states completed the survey between May and June of 2014.

The three primary purposes of the survey include:

- Providing an overview of how ETPLs are managed and administered across the United States
- Assessing how states collect, use, and report eligible training provider (ETP) program information
- Identifying challenges in ETPL management and administration

To address these goals, the survey covered a number of topics including:

- Responsibility for managing state ETPLs
- Specific criteria considered in determining program eligibility for inclusion on ETPLs
- Data used to certify programs for inclusion on ETPLs
- Frequency of updates to the lists

- Responsibility for updates to the lists
- Inclusion of training programs from other states on ETPLs
- Removal of programs from the lists
- Availability of program performance information for potential training customers
- Challenges faced by states in managing their ETPLs

In the analysis of the survey data, factors such as the rigor of the ETPL standards and practices and the quality of the performance reporting were examined. In addition, the analysis sought to identify patterns and trends among states that have initial eligibility waivers and those that allow for greater local control of ETPL processes. These dynamics were further explored through brief, informal follow-up discussions with ETPL coordinators and training providers in three states.

Data were analyzed and this report was written prior to the implementation of the Workforce Innovation and Opportunity Act (WIOA), which modifies some of the ETPL provisions under WIA. However, the findings provide information about the context in which WIOA is being implemented. This report serves as a reference for understanding how states are administering their ETPLs and the particular policies and practices they are adopting. This information will be particularly useful in light of WIOA, which has two important implications for the ETPL processes discussed in this report.¹ First, it eliminates the initial eligibility waiver discussed below. Second, it requires that all ETPLs use a common format for making program performance information publicly available. This report can provide information about the number of states that may be affected by these specific policy changes and how many are already performing the tasks associated with the new legislation.

ETPL Management and Administration

WIA allows states substantial flexibility in deciding how to administer their ETPLs. Understanding variation across administrative practices can provide insight into potential challenges and opportunities for future ETPL policy decisions and implementation. To examine this variation, the ETPL Coordinator Survey collected information about:

- Whether the state agency or WIBs are responsible for particular ETPL tasks
- The frequency at which the list is updated
- How decisions are made about whether programs are addressing local economic needs
- How programs from other states are included on the list

Survey responses indicated that states maintain significant responsibility for many of the key tasks associated with ETPL management. In about half of responding states, the state agency

¹ Office of the Vice President of the United States. 2014. Ready to Work: Job-Driven Training and American Opportunity. Report to the President of the United States. Washington, DC, http://www.whitehouse.gov/sites/default/files/docs/skills_report.pdf.

conducts many ETPL tasks without any involvement from WIBs. These more centralized states tend to be more rigorous in their ETPL standards and practices and to have higher-quality performance reporting.

About half of all responding states require that the ETPL be updated at least once a year as required under WIA; however, about a third have no statewide requirement for how often the list is updated. This lack of timely updates means that programs that no longer meet performance standards may remain on the list or that the information provided to training customers may be outdated.

To increase the likelihood that federally funded training results in positive employment outcomes, WIA requires that ETP programs address occupations that are locally considered to be high wage and in high demand. Over a quarter of responding states do not require that programs provide training in these occupations. Even among those that do, the majority have mechanisms for exemptions. Where ETP programs are required to address high-demand occupations, states, WIBs, or both may determine which programs qualify.

The majority of responding states allow out-of-state programs on their ETPLs. To be added to the list, these programs most often have to go through the same application process as in-state programs.

Collecting, Using, and Reporting ETP Program Information

WIA's goals to ensure the quality of ETP programs and to disseminate program information to training customers depend on the rigorous collection, use, and reporting of program data.

Collecting Program Information

Responding states rely on a variety of data sources for program information including:

- Self-reported data from training providers
- Student records: program completion, courses completed, and so on
- Unemployment Insurance (UI) wage records

Almost all responding states collect self-reported data from training providers. However, when collected for the purpose of measuring program performance, these data may be inaccurate, reflecting a tendency for training providers to report data that reviewers will perceive as favorable. Fewer states are using student records or UI wage records, which tend to be more reliable. Findings from our follow-up phone calls to state and local ETPL coordinators suggest that some WIBs are encountering substantial challenges in accessing these data.

Using Program Performance Information

Two key purposes for collecting program information are to determine whether programs are eligible to be added to the ETPL (initial eligibility) and whether they are eligible to remain on the ETPL (subsequent eligibility). WIA requires the consideration of program cost and performance

information in determining eligibility to ensure that the ETPLs include high-quality training programs. However, DOL has issued initial eligibility waivers to 39 states. These waivers essentially exempt these states from conducting subsequent eligibility reviews.

Over half of responding states are using program performance information to decide whether programs are initially eligible for inclusion on the ETPL. Of responding waiver states, 60 percent indicated that either the state or WIBs continue to collect performance information after this initial eligibility determination even though the waiver exempts them from this requirement. Nine of these responding waiver states are then using that information to determine if programs meet the performance standards necessary to remain on the ETPL. These states are essentially performing the same tasks required of those without a waiver.

Most responding states are collecting information about program performance when ETPs apply for initial inclusion on the ETPL, during following reviews of eligibility, or both. However, five responding states have no requirements from either the state or local WIBs that program performance information be collected at any point. Thus, lower-quality programs may have a good chance of being included on the list, and training customers may not have access to all the information they need to make informed decisions about which training program to attend.

Reporting Program Performance Information

The ability of training customers to make informed decisions about which training program to attend depends on access to up-to-date and complete program performance and cost information. Just over half of responding states are making this information publicly available. Among these states, the reported data are often not complete across programs. A lack of information may make it more difficult for training customers to make informed decisions about programs on the ETPL.

Challenges Associated with ETPL Tasks

Administering, maintaining, and managing the ETPL presents a number of potential challenges related to working with training providers, collecting ETP program information, and coordinating state and local ETPL efforts. Improving ETPL policies and practices requires an understanding of the extent to which states struggle with these challenges.

Responding states find most tasks related to working with training providers to be easy. They rate getting new providers on the list and including enough qualified providers as particularly easy. Additionally, tasks related to state and local ETPL coordination, such as ensuring local WIB compliance with ETPL requirements and sharing information between state and local offices, are rated as relatively easy. It is substantially more difficult for states to gather information about ETP programs from training providers. Almost 60 percent of responding states rated this task as difficult or very difficult. This issue was also mentioned frequently in our follow-up discussions with ETPL coordinators and training providers.

Collecting reliable data about ETP program performance is the task most frequently rated as difficult or very difficult by responding states. However, those with more rigorous ETPL standards

and practices and those that do not have waivers were most likely to rate this task as being less difficult.

1. INTRODUCTION

A primary objective of the Workforce Investment Act (WIA) is to increase the training options available to adult and dislocated workers. Under WIA's predecessor, the Job Training Partnership Act, customers eligible to receive federal training funds were often limited to a preselected group of training providers who had established agreements with local workforce centers.² Rather than having training options driven by contractual agreements and case managers, WIA instituted a market-based system in which training customers receive funds through a voucher referred to as an Individual Training Account (ITA). Individuals can then use ITAs to pay for approved programs that meet their career goals and needs.

To receive funds from ITAs, training providers must have their programs reviewed and approved by workforce investment boards (WIBs), state agencies, or both. Approved programs are then included on the state's Eligible Training Provider List (ETPL). The goal of this approval process is to ensure that customers use ITA funding for training in high-quality programs that are likely to result in successful training and employment outcomes.³

Another purpose of the ETPL is to provide training customers with information about approved programs through a consumer reporting system (CRS). The CRS can include program information such as employment outcomes for program completers, cost or tuition, and program length. The goal of providing this information is to enable training customers to make informed decisions about which programs best suit their needs.

Criteria for determining whether programs are initially eligible for inclusion on the ETPL vary among states. However, after programs are added to the list, they must meet acceptable performance levels on specific criteria identified by WIA in order to remain eligible for subsequent inclusion on the ETPL. Although WIA identifies these criteria, states and/or WIBs determine the performance levels programs must meet on each criterion. States and WIBs also have the flexibility to set additional performance criteria that programs must meet to be included on the ETPL. Because it can be difficult to collect the performance information needed to judge whether programs meet the relevant criteria, the U.S. Department of Labor (DOL) has issued a number of initial eligibility waivers. These waivers exempt states from subsequent eligibility requirements. Currently, 39 states have active waivers. (Appendix A lists these waiver states.)

While WIA provides general guidelines for ETPL administration, program eligibility requirements, and reporting processes, it also allows states a great deal of flexibility in implementation. This flexibility has led to substantial variation in ETPL policies and practices within and across states. Since ETPL policies can influence training and employment outcomes, it is critical to develop a

² D'Amico, Ronald, and Jeffrey Salzman. 2004. "Implementation Issues in Delivering Training Services to Adults under WIA." In Christopher J. O'Leary, Robert A. Straits, and Stephen A. Wandner, eds., *Job Training Policy in the United States*, pp. 101–134. Kalamazoo, MI: W. E. Upjohn Institute.

³ Eyster, Lauren. 2011. *Ensuring the Quality of Training Providers under the Workforce Investment Act (WIA)*. U.S. Department of Labor/ Employment and Training Administration.

comprehensive understanding of the variation in ETPL practices and challenges throughout the United States.⁴ While previous research has examined these topics through case studies in a limited number of states, DOL's Employment and Training Administration (ETA) seeks a more comprehensive overview as well as an update to earlier findings.⁵

To provide a comprehensive picture of ETPL administration, ETA contracted with IMPAQ International, LLC (IMPAQ) to conduct the study *Feasibility of Using WDQI and ETPL Data for Consumer Reports*. As part of this project, IMPAQ invited ETPL coordinators in all 50 states, Puerto Rico, and the District of Columbia to participate in a web survey about ETPL policies and practices. The three primary purposes of the survey include:

- Providing an overview of how ETPLs are managed and administered across the United States
- Assessing how states collect, use, and report ETP program information
- Identifying challenges in ETPL management and administration

Following the survey, we selected three states in which we conducted follow-up discussions with state and local ETPL coordinators and training providers. These discussions provide additional insight into the survey findings.

In this report, we describe this research in detail and summarize our key findings. Data were analyzed and this report was written prior to the implementation of the Workforce Innovation and Opportunity Act (WIOA), which modifies some of the ETPL provisions under WIA. However, the findings provide information about the context in which WIOA is being implemented. Section 2 of the report provides an overview of the purpose and function of ETPLs and describes relevant WIA requirements. Section 3 describes our survey methodology, including the design and implementation of the survey, and the limitations of our work. Sections 4–8 present survey findings related to the characteristics of ETPL administration, ETP eligibility requirements, how ETP program data are collected, how program performance is reported, and the challenges associated with ETPL tasks. Sections 9–11 use the survey data to group states according to the rigor of their ETPL standards and practices, the quality of current program performance reporting, and the centralization of ETPL administration. We use these groupings to explore variation across states and to identify specific challenges related to ETPL tasks. Section 12 discusses our follow-up calls with state and local ETPL coordinators and training providers in three states. Finally, Section 13 summarizes our conclusions and describes planned follow-up activities.

⁴ *Ibid.*

⁵ D'Amico, Ronald. 2001. *An Evaluation of the Individual Training Account/Eligible Training Provider Demonstration*. Washington, DC: Social Policy Research Associates. Decker, Paul, and Irma L. Perez-Johnson. 2004. "Individual Training Accounts, Eligible Training Provider Lists, and Consumer Report Systems." In Christopher J. O'Leary, Robert A. Straits, and Stephen A. Wandner, eds., *Job Training Policy in the United States*, pp. 177–210. Kalamazoo, MI: W. E. Upjohn Institute.

2. BACKGROUND

The public workforce system, authorized under WIA and administered by DOL, provides training services to eligible adult and dislocated worker customers. To provide maximum customer choice and encourage a market-driven system, WIA created the ITA, a voucher-like mechanism that allows participants to “purchase” training services.⁶ Under WIA, states are required to provide ITA training customers with a list of training providers that are approved to receive ITA funds. This list of approved providers is the ETPL. Programs are approved for the ETPL based on performance (as measured by program completion and employment rates, for example) and whether the program offers training in a high-wage, high-demand occupation. States have a great deal of flexibility in determining the criteria they use to approve training providers and how they publish their ETPLs. Moreover, states may delegate some or all of their ETPL management responsibilities to local workforce investment areas.⁷

In this section of the report, we provide an overview of ETPL requirements and processes, discuss the federal waivers granted to many states, and describe some of the challenges associated with developing and maintaining ETPLs.

2.1 ETPL Requirements and Processes

Part 662, Subpart D of the WIA regulations provides a structure for states to use to create and maintain their ETPLs.⁸ WIA specifies the requirements and processes the states should use to vet “programs of training services”: a course or series of courses that leads to a certificate or degree or promotes job-related skills and competencies. There are two eligibility processes for training providers seeking state approval to serve ITA participants: 1) initial eligibility, which can be waived for colleges and registered apprenticeship programs; and 2) subsequent eligibility, which all providers must undergo after the initial period of eligibility ends. To be considered for eligibility, programs must provide education and training in a high-wage, high-demand occupation, as determined by the state. States have overall responsibility for their ETPLs, but local WIBs must support them in implementing the lists. This section summarizes the requirements and processes states must implement to develop and maintain their ETPLs.

2.1.1 State and Local ETPL Responsibilities

Under WIA regulations, the governor of each state must establish screening procedures and minimum criteria for initial and subsequent eligibility of training programs. A designated state agency must then develop and maintain the state list of eligible providers and programs submitted by local WIBs. It must also determine if the programs meet the minimum performance levels set by the governor. The state agency must verify the accuracy of the information provided and remove from the list programs that do not meet the criteria. Finally, the state agency must

⁶ U.S. Department of Labor. 2000, 11 August. “Workforce Investment Act: Final Rule.” *Federal Register* 65:156. Eyster, 2011, *op cit*.

⁷ Eyster, 2011, *op cit*.

⁸ U.S. Department of Labor, 2000, *op. cit*.

disseminate the ETPL, which contains the vetted performance and cost information, to American Job Center (AJC) operators in the state.

Local WIBs also have responsibilities in administering the ETPL. They must help the state agency by accepting applications and carrying out procedures set by the governor for determining initial and subsequent eligibility of programs. Local WIBs must develop a local ETPL with the required performance, cost, and other information and submit it to the state agency. Dissemination and use of the ETPL through the local AJC system is also required. In addition, the local WIBs must work with the state agency to terminate from the ETPL any providers that provide inaccurate information or violate WIA requirements.

The local WIBs may support the implementation of the ETPL in other ways as well.⁹ They may provide the governor with recommendations for procedures for determining initial eligibility. Local WIBs may also put local procedures in place for increasing performance standards for eligible programs; they may require additional program-specific information for maintaining subsequent eligibility.

2.1.2 Initial Eligibility

Depending on the type of institution, training providers follow one of two tracks to determine if their programs are initially eligible for inclusion on the ETPL. First, for institutions of higher education (only those eligible under Title IV of the Higher Education Act) and registered apprenticeship programs, local WIBs develop and accept application forms. These training providers are generally exempt from initial eligibility requirements; they are automatically included on the ETPL.

Second, other types of training providers, such as community-based organizations, must follow the local WIB's procedures for determining initial eligibility. The governor sets standards, which generally include cost and performance criteria. States have some latitude to determine how much program, performance, and cost information programs must supply for initial eligibility determinations. The period of initial eligibility for approved programs lasts no longer than 18 months. After that, subsequent eligibility is to be determined on an annual basis.

2.1.3 Subsequent Eligibility

To maintain their eligibility to receive ITA funds, all training providers that were initially eligible for the ETPL must regularly submit performance and cost data for the programs they wish to remain on the ETPL. At a minimum, this information must be supplied annually. As part of this subsequent eligibility process, WIA requires that providers submit program information on:¹⁰

- Minimum completion rates for all program participants
- Minimum unsubsidized employment rates for all program participants
- Minimum wages at placement for all program participants

⁹ U.S. Department of Labor, 2000, *op. cit.* See pages 49407–8.

¹⁰ See WIA Section 122(d).

- Minimum unsubsidized employment rates for WIA participants who completed the program
- Minimum rates of retention in employment at six months for WIA participants who completed the program
- Minimum average wages at six months for WIA participants who completed the program
- Minimum rates of licensure, certification, attainment of degrees, or attainment of other industry-recognized credentials for WIA participants who completed the program

The state may ask for additional program information, including:

- Employment and wage retention rates for all training participants completing the program
- Licensure or certification rates for all training participants completing the program
- Rates of earning industry-recognized credentials for all training participants completing the program

To remain on the ETPL, programs must meet minimum acceptable performance standards based on these criteria. The specific performance standards are established by the state.

If the state permits it, local WIBs can apply more stringent criteria to evaluate provider performance for the eligibility process. The minimum performance standards established by local WIBs must take into account the economic, geographic, and demographic factors in the local area and the characteristics of the populations they serve.

Providers are also required to provide verifiable cost information for each program. The state is responsible for establishing a cost-effective method for collecting the required eligibility information and must assist training providers in collecting this information if the provider can demonstrate that its collection is cost-prohibitive. This assistance is paid for with funds designated for statewide workforce investment activities.

2.1.4 Maintaining and Disseminating the ETPL

The state must maintain the ETPL and make it available, along with performance and cost information, to training customers. The ETPL is to be linked to a consumer reporting system (CRS), which is the mechanism for providing performance data on approved training programs to ITA participants. ETPLs have to be available through AJC operators, and many AJCs make the lists available on the Internet. States can also choose to include training providers that are not approved for ITAs as part of their dissemination efforts, for example, by including ineligible providers on the same website listing approved providers. In addition, a state can develop reciprocal agreements with other states. These agreements allow programs on one state's ETPL to be automatically included on another state's ETPL. These policies can expand the training provider market from which ITA participants can choose a training program.

2.2 Federal Waivers

Since the implementation of WIA, states have requested several types of federal waivers of the legal requirements related to ETPLs. DOL provides information on these waiver requests in an online database.¹¹ States have requested the following types of ETPL waivers:

- Disseminating training provider performance and cost information
- Initial eligibility
- Application process
- Providers adding programs
- Exemption from the ETPL
- Local input to the ETPL
- Initial and subsequent eligibility requirements

The only type of waiver that has been approved is the initial eligibility waiver, which allows states to extend the initial eligibility period for which the training provider is approved. Essentially, this waiver exempts initially eligible programs from subsequent eligibility requirements. In fact, a majority of states (39) have received this kind of waiver. (See Appendix A for a full list.) A recent report explores how federal WIA waivers have been requested and used at the state and local level, but the report does not provide detail on waivers related to ETPLs.¹²

2.3 Challenges with Implementing ETPLs

In the WIA regulations, DOL acknowledges “that the eligible training provider requirements may present significant implementation challenges to States and local areas.”¹³ Some of the anticipated challenges highlighted in the public comments to the WIA regulations include:

- Ensuring that local areas have sufficient numbers and a diverse set of providers to create an effective marketplace of training programs available to WIA participants with ITAs
- Ensuring that there is fairness in the process of determining training provider eligibility
- Reducing burden on providers to submit accurate performance information to which they may not have ready access, such as employment data
- Preventing discrimination by training providers in accepting and enrolling WIA participants
- Providing information on eligible training programs to WIA participants in a way that helps them make good decisions about how to use their ITAs

¹¹ The database is available at <http://www.doleta.gov/waivers/>.

¹² Rowe, Gretchen, Brittany English, Cassandra Pickens-Jewell, Samina Sattar, and Jessica Ziegler. 2012, September. *Evaluation of Waivers Granted Under WIA: Final Report*. Washington, DC: Mathematica Policy Research.

¹³ U.S. Department of Labor, 2000, *op cit*. See pages 345 and 493.

No changes to the regulations, other than clarifications, were made in response to the public concerns.

Three DOL-sponsored evaluations of WIA highlight some of the challenges in implementing effective ETPLs:

- ***National Evaluation of the Implementation of the Workforce Investment Act:*** an implementation study of WIA in the five years after its passage, covering 21 states and 40 local workforce investment areas.¹⁴
- ***An Evaluation of the Individual Training Account/Eligible Training Provider Demonstration:*** the implementation component of an experimental evaluation to understand the implementation of three approaches to ITAs in 13 states and local areas.¹⁵
- ***The Workforce Investment Act in Eight States:*** an evaluation of eight states with in-depth case studies of the state and local administration of WIA.¹⁶

All three evaluations provide details on the implementation of the ETPL policies and processes in states and local areas. Researchers found that many local staff were using a “guided” or “informed” choice model in which they worked with the ITA customers to make training selections; the choices were ultimately being made by the customers after receiving information on their options. One of the evaluations specifically tested three interventions for supporting training provider choice at One-Stops.¹⁷ In the first and third evaluations listed above, some state staff and training providers interviewed said that the process to become an ETP could be burdensome and expensive. The second evaluation noted that the ETP markets in local areas were mostly composed of community colleges and proprietary schools. However, some community colleges “balked” at the eligibility requirements and considered applying for the ETPL to be not worth the trouble. In many of the states included in these studies, local areas were permitted to develop the ETPL processes within a state structure that oversaw the local efforts. Another study, conducted by the U.S. Government Accountability Office (GAO),¹⁸ surveyed a sample of local WIBs about training under WIA. Among other things, the survey asked local respondents about the implementation of ETPLs, including the marketplace of providers and the available performance data on training. The GAO survey revealed that there was often a lack of training providers in rural areas, limiting local WIBs’ ability to create a functioning marketplace

¹⁴ D’Amico, Ronald, et al. 2004, June. *The Workforce Investment Act After Five Years: Results from the National Evaluation of the Implementation of WIA*. Prepared for the U.S. Department of Labor Employment and Training Administration. Oakland, CA: Social Policy Research Associates.

¹⁵ D’Amico, Ronald, and Jeffrey Salzman. 2004, December. *An Evaluation of the Individual Training Account/Eligible Training Provider Demonstration*. Prepared for the U.S. Department of Labor, Employment and Training Administration. Oakland, CA: Social Policy Research Associates.

¹⁶ Barnow, Burt S., and Christopher T. King. 2005, February. *The Workforce Investment Act in Eight States*. Prepared for the U.S. Department of Labor, Employment and Training Administration. Albany, NY: The Rockefeller Institute of Government.

¹⁷ D’Amico and Salzman, 2004, *op. cit.*

¹⁸ U.S. Government Accountability Office. 2005, June. *Workforce Investment Act: Substantial Funds Are Used for Training, But Little Is Known Nationally about Training Outcomes*. Report to Congressional Requesters. Washington, DC: U.S. GAO.

for ITAs. GAO also found that the local WIBs had difficulties providing good performance data on training providers, limiting their ability to evaluate the effectiveness of these providers.

While there is some literature on the implementation of the ETPLs, there are few details on the states' management of ETPLs, specific eligibility criteria, the challenges states have faced, and the use of waivers.

3. SURVEY METHODOLOGY

Although WIA provides guidance on ETPL policies and procedures, states have flexibility in how they implement the regulations. To date, there is limited information about how ETPL administration varies across states and about the types of challenges states face in managing ETPLs. To develop a comprehensive understanding of these issues throughout the U.S., we fielded a survey of ETPL coordinators in all 50 states plus the District of Columbia and Puerto Rico. In this section, we describe how the survey was developed and implemented.

3.1 The Survey Instrument

The primary goals of the ETPL Coordinator Survey were to:

- Provide an overview of ETPL management and administration
- Assess how states collect, use, and report ETP program information
- Identify challenges in ETPL management and administration

To address these goals, we developed a survey instrument covering a number of topics, including:

- Responsibility for managing state ETPLs
- Specific criteria considered in determining program eligibility for inclusion on ETPLs
- Data used to certify programs for inclusion on ETPLs
- Frequency of updates to the lists
- Responsibility for updates to the lists
- Inclusion of training programs from other states on ETPLs
- Removal of programs from the lists
- Availability of program performance information for potential training customers
- Challenges faced by states in managing their ETPLs

The complete survey instrument is provided in Appendix B.

3.2 Survey Sample and Administration

To provide a comprehensive understanding of how states administer ETPLs, we invited ETPL coordinators from all 50 states, plus the District of Columbia and Puerto Rico, to participate in a web-based version of the survey. DOL national and regional office staff assisted us with the process of identifying appropriate individuals in each state to whom we emailed the survey invitation.

We sent the survey invitation to the ETPL coordinator in each state. This person is likely to have the most comprehensive and up-to-date knowledge of how the ETPL is administered. Nevertheless, the level of detail covered by the survey instrument raised the possibility that the

ETPL coordinator would be unable to answer every question. To account for such instances, the survey instructions directed respondents to look up answers or to seek input from other staff, as necessary.

To maximize response rates, respondents received a pre-notification email from ETA approximately one week prior to receiving the survey. The email notified them of the upcoming survey and explained the importance of participation. We then sent respondents an invitation email, providing information about the study, OMB clearance, a survey link, and a unique ID for accessing their state’s survey.

Respondents were asked to submit their responses within three weeks of the date they received the survey invitation. We sent weekly reminder emails to non-responders. ETPL coordinators from 33 states submitted responses within this three-week period. We called those who did not respond within this timeframe and attempted to conduct the survey over the phone. In all, ETPL coordinators in 46 states responded to the survey, resulting in a response rate of 89 percent. Exhibit 1 shows the states that responded to the survey and those that did not.

Exhibit 1. Summary of Survey Responses

States That Responded (46)			States That Did Not Respond (6)
Alabama	Kentucky	Pennsylvania	
Alaska	Maine	Puerto Rico	
Arizona	Maryland	Rhode Island	
Arkansas	Massachusetts	South Carolina	
California	Michigan	South Dakota	
Colorado	Minnesota	Tennessee	Idaho
Connecticut	Missouri	Texas	Louisiana
Delaware	Montana	Utah	Mississippi
District of Columbia	Nevada	Vermont	Nebraska
Florida	New Hampshire	Virginia	New Jersey
Georgia	New Mexico	Washington	Ohio
Hawaii	New York	West Virginia	
Illinois	North Carolina	Wisconsin	
Indiana	North Dakota	Wyoming	
Iowa	Oklahoma		
Kansas	Oregon		

3.3 Study Limitations

The subsequent sections of this report present the results of the ETPL survey. Before describing the results, we note two limitations of our work.

First, ETPL policies and practices vary widely across states. Therefore, data about ETPL practices in any single state (or collection of states) cannot be used to draw conclusions about how other states manage their ETPLs. This limitation is especially true given that some survey questions applied to only a small portion of respondents. The resulting small sample implies that caution should be exercised when drawing conclusions about state ETPL management.

Second, the survey provides a tool for systematically collecting general information about ETPL management across states. However, it does not provide in-depth information about *why* states have implemented particular ETPL practices. IMPAQ collected this information as a part of the follow-up activities described in Section 12.

4. CHARACTERISTICS OF ETPL ADMINISTRATION

As mentioned previously, states have substantial flexibility in determining how to implement WIA ETPL regulations. For example, in some states, all tasks related to ETPL coordination are conducted at the state level; in others, many of these tasks devolve to the WIBs. Additionally, WIA requires states to update their ETPLs at least once a year, but some states and WIBs update the lists more frequently. States also have a great deal of discretion in determining whether and how to include ETP programs from other states. Because of the variation in these processes, it is necessary to develop a comprehensive picture of how states are actually translating WIA regulations into practice. Understanding variation across these administrative practices can provide information about potential challenges and opportunities for future ETPL policy decisions and implementation.

In this section, we discuss variation in how states are conducting key tasks associated with ETPL administration including:

- Dividing responsibilities for conducting ETPL tasks between the state and WIBs
- Updating the ETPL
- Considering whether ETP programs must address high-demand occupations
- Making decisions about adding ETP programs from other states

The box below summarizes our key findings related to how ETPLs are administered. Detailed results are presented in Sections 4.1 through 4.4.

Key Findings Related to Characteristics of ETPL Administration

- The states retain considerable control in conducting key tasks associated with the ETPL.
- About a quarter of responding states have no statewide requirement for how often they update the ETPL.
- In over a quarter of responding states, ETP programs are not required to address high-demand occupations.
- Over half of all responding states require training providers listed on another state's ETPL to go through the same application process an in-state program would go through.

4.1 Division of ETPL Tasks between the State and WIBs

Examining how ETPL tasks are divided between the state and local WIBs can provide important insight into potential training outcomes of individuals as well as the consistency of information associated with ETP programs. Previous research found that earnings of WIA training participants tend to be lower in states where WIBs are given substantial flexibility in ETP policies.¹⁹

¹⁹ Eyster, 2011, *op. cit.*

Additionally, WIB autonomy in setting ETP policies may result in inconsistencies in the way that certain ETPL tasks, such as updating the ETPL and setting eligibility criteria, are conducted across the state, making ETPL management more difficult. However, allowing WIBs greater influence in ETPL tasks may result in policies that better reflect the needs of the local workforce. For these reasons, it is important to assess variation in the division of ETPL tasks between the states and WIBs. Additionally, examining variation in who conducts these tasks provides a starting point for future analyses to assess how this variation influences the ability of training customers to choose among high-quality training programs.

The survey asked whether a number of key tasks associated with ETPL administration are conducted at the state and/or WIB level:

- Setting program eligibility criteria
- Verifying that programs are eligible to be included on the ETPL
- Updating the ETPL
- Reporting program performance

As shown in Exhibit 2, the states retain considerable control over managing ETPL tasks. In about half of the responding states, the state independently sets program eligibility criteria, updates the ETPL, and reports program performance. When WIBs are involved in these tasks, they are most often conducting them in combination with the state rather than independently. WIBs are most frequently involved in verifying that programs are eligible to be included on the ETPL. These findings are consistent with the WIA requirement that local boards take responsibility for verifying program cost and performance outcomes under the direction of the state, as described in Section 2.

In general, states maintain substantial influence over ETPL tasks.

Exhibit 2. ETPL Tasks Conducted at State and WIB Levels

Please indicate whether each of the following tasks of managing the ETPL is conducted at the state level or WIB level.	Both State & WIB Level	State Level Only	WIB Level Only	Total
Setting program eligibility criteria	37% (17)	48% (22)	15% (7)	46
Verifying that programs are eligible to be included on the ETPL	46% (21)	33% (15)	22% (10)	46
Updating the ETPL	37% (17)	50% (23)	13% (6)	46
Reporting program performance	21% (9)	57% (24)	21% (9)	42

Source: ETPL Coordinator Survey

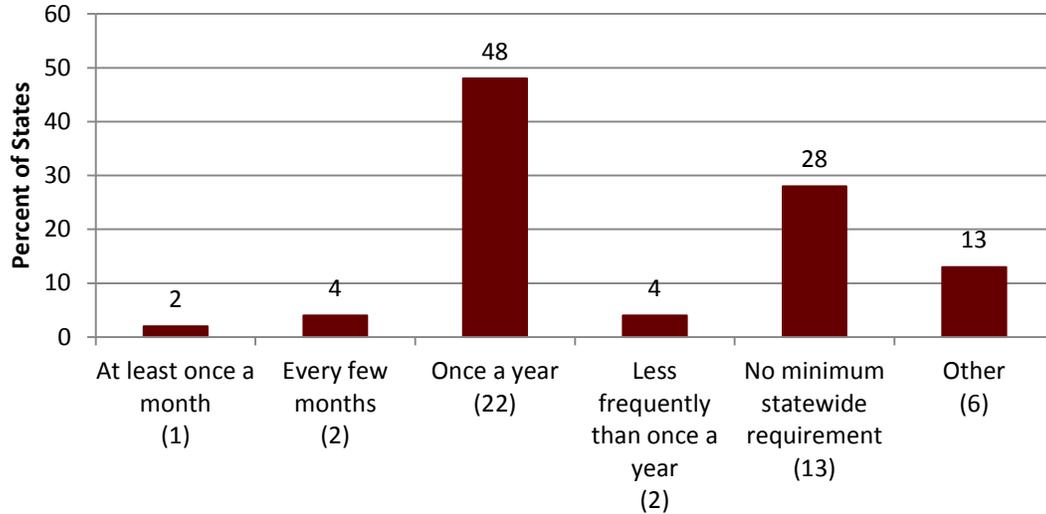
Note: Number of responses is in parentheses. Percentages are of total completed responses and may not add up to 100 percent due to rounding.

4.2 Updating the ETPL

As noted earlier, a primary purpose of the ETPL is to provide potential training customers with information about programs so that they can make informed decisions about how to use their ITAs. The list thus needs to reflect accurate information about training programs. WIA regulations require that ETPLs be updated at least annually. Exhibit 3 summarizes how frequently responding states require that their ETPLs be updated. In 48 percent of responding states (22 states out of 46), there is a statewide requirement that the ETPL to be updated once a year; in six percent (3 states out of 46), there is a requirement that it be updated more frequently. However, in 28 percent of responding states (13 states out of 46), there is no minimum statewide requirement for how often the ETPL is updated. Unless the WIBs in these states are independently updating the ETPL, the information provided to training customers may be out of date.

Exhibit 3. Statewide Requirements for Updating the ETPL

What is the minimum statewide requirement for how frequently the ETPL is updated?



Source: ETPL Coordinator Survey

Note: Number of responses is in parentheses. Percentages are of total completed responses and may not add up to 100 percent due to rounding. Total number of states responding to this question = 46.

Given that states with initial eligibility waivers are not required to reassess program eligibility or collect updated program information, it would not be surprising to find that waiver states update the information on their ETPLs less frequently than non-waiver states. Exhibit 4 shows that this is not necessarily the case. Over half of both responding waiver and non-waiver states require the ETPL to be updated at least once a year. Responding non-waiver states are actually less likely than waiver states to have a statewide requirement for how frequently the ETPL is updated.

Exhibit 4. Waiver Status and Updating the ETPL

What is the minimum statewide requirement for how frequently the ETPL is updated?	Initial Eligibility Waiver Status		
	State has a waiver	State does not have a waiver	Total
At least once a month	0% (0)	3% (1)	1
Every few months	8% (1)	3% (1)	2
Once a year	50% (6)	47% (16)	22
Less frequently than once a year	8% (1)	3% (1)	2
There is no minimum statewide requirement	17% (2)	32% (11)	13
Other	17% (2)	12% (4)	6
Total	12	34	46

Source: ETPL Coordinator Survey

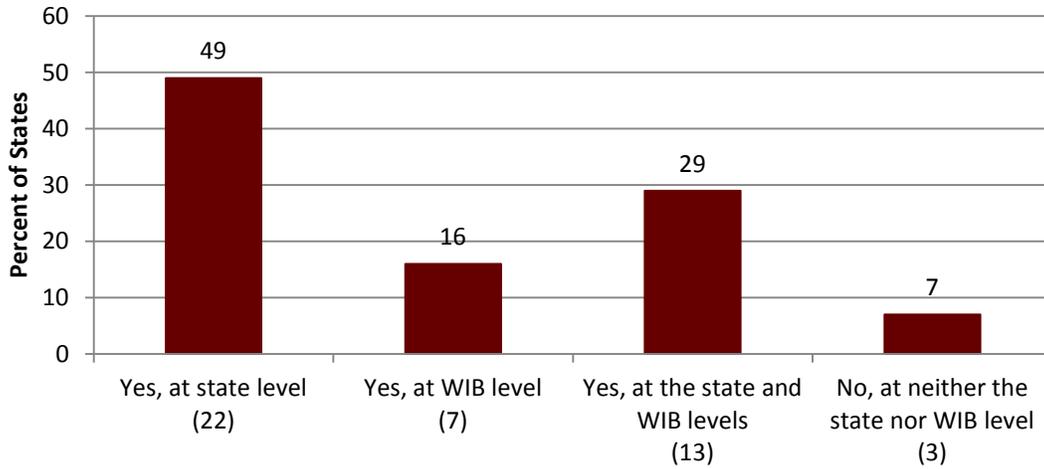
Note: Total number of states responding to this question = 46.

To ensure that all programs on the ETPL reflect state and/or local WIB requirements, it is important that programs that do not comply are removed from the list. Exhibit 5 shows the percentage of responding states that are removing non-compliant programs.²⁰ Of the 45 responding states, 93 percent (42 states) noted that non-compliant programs are removed from the ETPL during the updating process. In 49 percent of responding states (22 states out of 45), removal is done at the state level alone; in 45 percent (20 states out of 45), it is done at either the WIB level alone or at both the state and WIB levels. In seven percent of responding states (three states out of 45), non-compliant training programs are not removed from the ETPL during the updating process, implying that they may still be included in the list of program options presented to potential trainees.

²⁰ According to WIA, “non-compliant” refers to any eligible provider that substantially violates any requirement of the act or provides inaccurate information.

Exhibit 5. Removing Non-Compliant Programs

Are non-compliant training programs removed from the ETPL during the updating process?



Source: ETPL Coordinator Survey

Note: Number of responses is in parentheses. Percentages are of total completed responses and may not add up to 100 percent due to rounding. Total number of states responding to this question = 45.

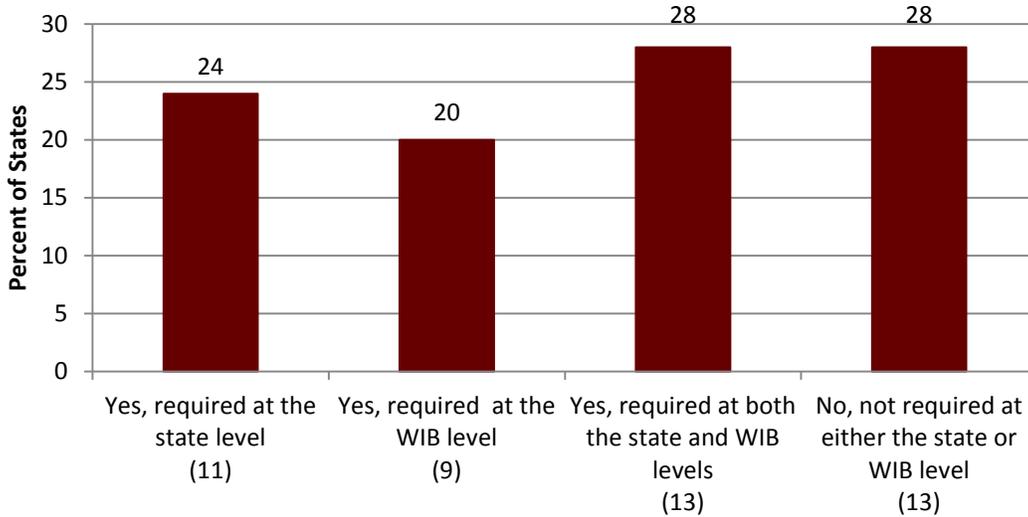
4.3 High-Demand Occupation Requirement

To increase the likelihood that WIA training customers will be able to find employment upon completing training, programs listed on the ETPL must offer training in high-wage, high-demand occupations. Exhibit 6 shows the percentage of states that require ETP programs to address high-demand occupations. In 28 percent of responding states (13 states out of 46), neither the state nor WIBs require programs on the ETPL to address high-demand occupations.

In almost a third of responding states, ETP programs are not required to address high-demand occupations.

Exhibit 6. High-Demand Occupation Requirement

In order to be included on the ETPL, is it required that training programs address high-demand occupations?



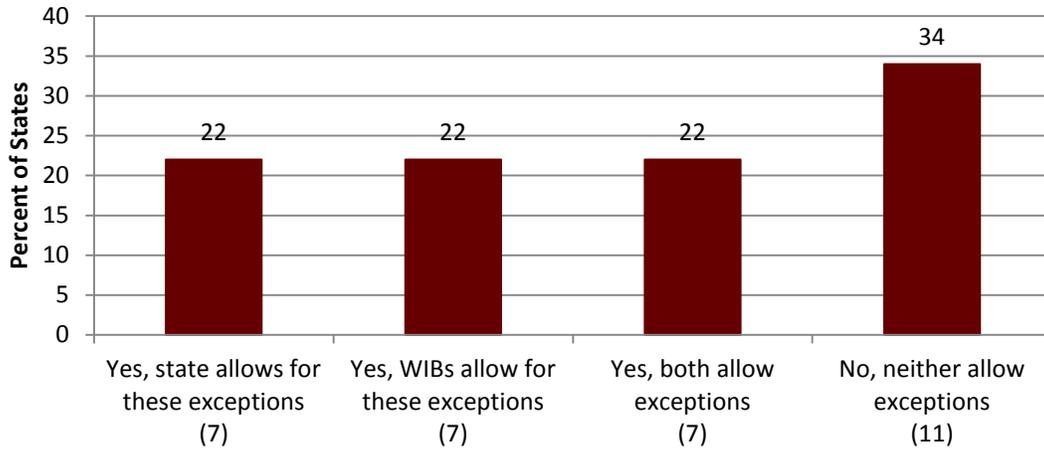
Source: ETPL Coordinator Survey

Note: Number of responses is in parentheses. Percentages are of total completed responses and may not add up to 100 percent due to rounding. Total number of states responding to this question = 46.

As shown in Exhibit 7, among states that do have a requirement that ETP programs address high-demand occupations, some allow for exceptions. In 66 percent of responding states where ETP programs *are* required to address high-demand occupations (21 states out of 32), the state and/or WIBs allow exceptions. The fact that so many states do not require ETP programs to address high-demand occupations suggests that training customers may use their ITAs for training programs that are not likely to result in favorable employment outcomes.

Exhibit 7. Exceptions to the High-Demand Occupation Requirement

Can exceptions be made for including programs on the ETPL that do not address high-demand occupations?



Source: ETPL Coordinator Survey

Note: Number of responses is in parentheses. Percentages are of total completed responses and may not add up to 100 percent due to rounding. Total number of states responding to this question = 32.

In those states that require programs to address high-demand occupations, information must be compiled to guide decisions about what constitutes a high-demand occupation. Exhibit 8 summarizes how these states gather this information. Of responding states, 58 percent (19 states out of 33) said that the state plays a role in developing this list of high-demand occupations; 58 percent (19 states out of 33) said that WIBs play a role in developing the list. In 15 percent (five states), there is no formal list of high-demand occupations; instead, staff rely on their knowledge of the local economy.

Exhibit 8. Determining High-Demand Occupations



Source: ETPL Coordinator Survey

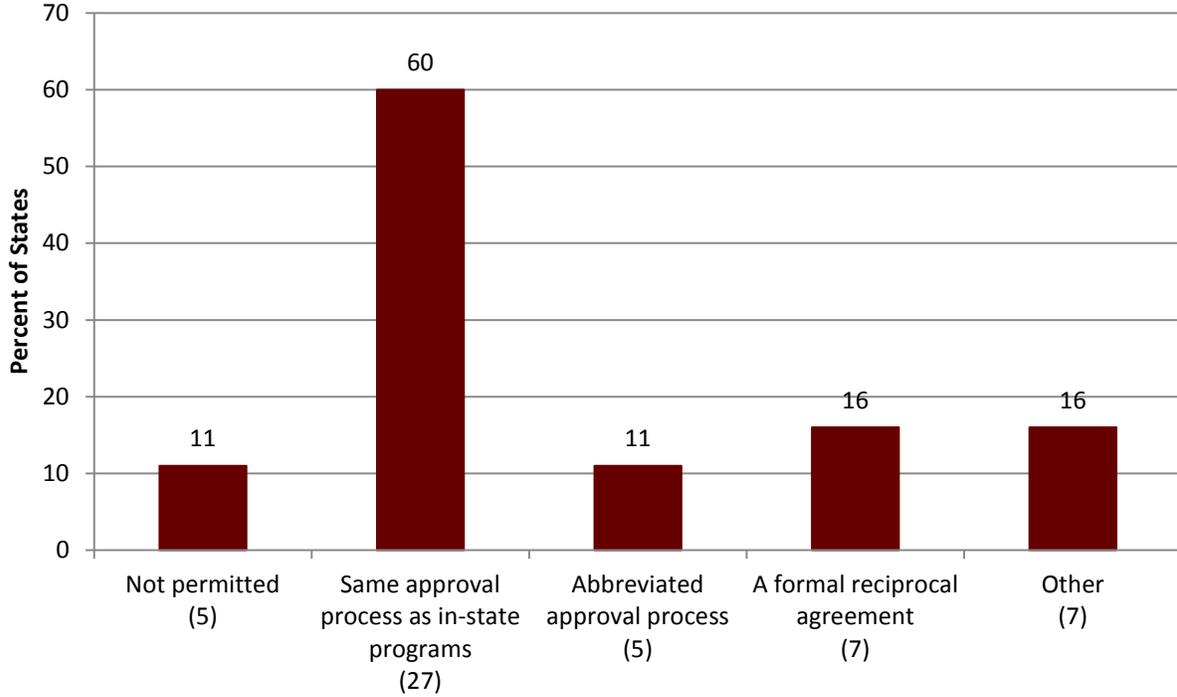
Note: Number of responses is in parentheses. Percentages are of total completed responses. The total percentage is greater than 100% because respondents were able to select more than one option. Total number of states responding to this question = 33.

4.4 Adding ETP Programs from Other States

To increase the number of training programs available to training customers, states often allow programs based in other states onto their ETPLs. WIA allows states significant flexibility regarding whether they include out-of-state programs, and, if they do, what processes these programs must go through to be included. Exhibit 9 summarizes state processes for adding programs from another state's ETPL. In 11 percent of responding states (five states out of 45), programs from other states cannot be included on the ETPL. In 60 percent of responding states (27 states out of 45), training programs from other states are required to go through the same approval process as in-state programs, regardless of whether or not they are included on another state's ETPL. Seven out of 45 states, or 16 percent, have a reciprocal agreement in which programs on certain states' ETPLs are automatically eligible for inclusion on their state's ETPL. Only 11 percent of states (five out of 45) have an abbreviated approval process for programs on other states' ETPLs.

Exhibit 9. Adding Programs from Another State's ETPL

If a training program is approved to be included on another state's ETPL, which of the following processes are followed at the state and/or WIB level to include that program on your state's ETPL?



Source: ETPL Coordinator Survey

Note: Number of responses is in parentheses. Percentages are of total completed responses. The total percentage is greater than 100% because respondents were able to select more than one option. Total number of states responding to this question = 45.

5. WHAT ARE STATE PROGRAM ELIGIBILITY REQUIREMENTS?

The processes of initial and subsequent eligibility for ETP programs are designed to ensure that training customers are using ITAs for high-quality training programs—those that are likely to result in positive labor market outcomes for participants. Both eligibility review processes provide an opportunity for states and/or WIBs to assess whether training programs meet the quality standards required to be included on ETPLs. As noted, states and WIBs have substantial flexibility to determine the criteria used for determining initial eligibility as well as the performance standards for subsequent eligibility. Examining these criteria and performance standards provides insight into how training programs qualify for inclusion on the ETPLs and whether states are restricting their ETPLs to high-quality programs.

The box below gives our key findings related to state eligibility requirements. More details are presented in the remainder of the section.

Key Findings Related to Eligibility Requirements

- Just over half of responding states consider program performance information in determining initial eligibility.
- The most frequent reason for requesting an initial eligibility waiver was to reduce reporting burden for training providers.
- There is substantial variation in the performance standards required to meet subsequent eligibility requirements.
- In most states, WIBs are not setting more rigorous initial or subsequent eligibility criteria than those determined by the state.
- Many waiver states are collecting and using ETP program performance data in ways similar to those of non-waiver states; however, the performance indicators are often less comprehensive.

5.1 Determining Initial Eligibility

Other than programs offered by institutions of higher education and registered apprenticeship programs, all training programs whose providers wish to be eligible to receive funds from ITAs must apply for inclusion on the ETPL. To be included, programs must meet initial eligibility criteria set by each state's governor. States have substantial flexibility in the types of information they consider when determining initial eligibility. WIA requires that states consider program performance and cost when making these decisions; however, there are no specific requirements about what types of performance information must be considered or how cost information should influence decisions about initial eligibility. Additionally, states often consider other pieces of information when making decisions about initial eligibility, such as program accreditation and the amount of time the program has been in existence.

Examining variation in initial eligibility requirements provides information about how difficult it is for training programs to be included on the ETPL. This information is particularly important in waiver states, where the initial eligibility review may be the only point at which the quality of the program is assessed.

Because WIA does not specify criteria for determining initial eligibility, the survey asked respondents to identify the statewide criteria used to determine whether a program is initially eligible for inclusion on the ETPL. Exhibit 10 summarizes the criteria considered when determining initial eligibility. The most commonly considered item was training provider licensing or accreditation. Of the 45 responding states, 78 percent, or 35 states, identified licensing or accreditation as a consideration in determining initial eligibility. The degree or credential that training customers receive upon program completion was also widely considered in determining initial eligibility (64 percent of responding states, or 29 states out of 45). These items may be commonly used because this information is easily supplied by training providers.

Exhibit 10. Statewide Considerations in Determining Initial Eligibility

Which of the following items are among the statewide criteria for determining whether a program is initially eligibility for inclusion on the ETPL?	% (N)
Program provider licensing or accreditation	78% (35)
Degree or credential training customers will receive upon program completion	64% (29)
Program performance outcomes	56% (25)
Program addresses an in-demand occupation	44% (20)
Length of time program has been in existence	38% (17)
Program addresses a high-growth industry	29% (13)
Program cost	29% (13)
Qualifications of training staff	27% (12)
Other	29% (13)

Source: ETPL Coordinator Survey

Note: Percentages are of total completed responses. The total percentage is greater than 100% because respondents were able to select more than one option. Total number of states responding to this question = 45.

A primary purpose of ETP eligibility criteria is to ensure that training customers are using their ITAs to attend high-quality training programs. In determining what constitutes a high-quality program, WIA places significant emphasis on program performance. In 56 percent of responding states (25 states out of 45), program performance outcomes are considered when determining initial eligibility.²¹ Exhibit 11 shows whether performance outcomes are considered in waiver and non-waiver states. Of responding states that have a waiver, 48 percent (16 states out of 33) consider performance outcomes at initial eligibility, compared to 75 percent of responding states (9 states out of 12) without a waiver. The fact that some waiver states do not consider performance outcomes at initial eligibility implies that they may not ever consider this information, since they are exempt from subsequent eligibility requirements.

In five of the 17 waiver states that do not consider program performance in determining initial eligibility, neither the state nor the WIBs require the collection of program performance information after initial eligibility. In these states, collection of ETP program performance information is never required.

Exhibit 11. Waiver Status and Considering Program Performance at Initial Eligibility

Are program performance outcomes considered as part of the statewide criteria for determining initial eligibility?	Waiver Status		
	State has a waiver	State does not have a waiver	Total
Yes	48% (16)	75% (9)	25
No	52% (17)	25% (3)	20
Total	33	12	45

Source: ETPL Coordinator Survey

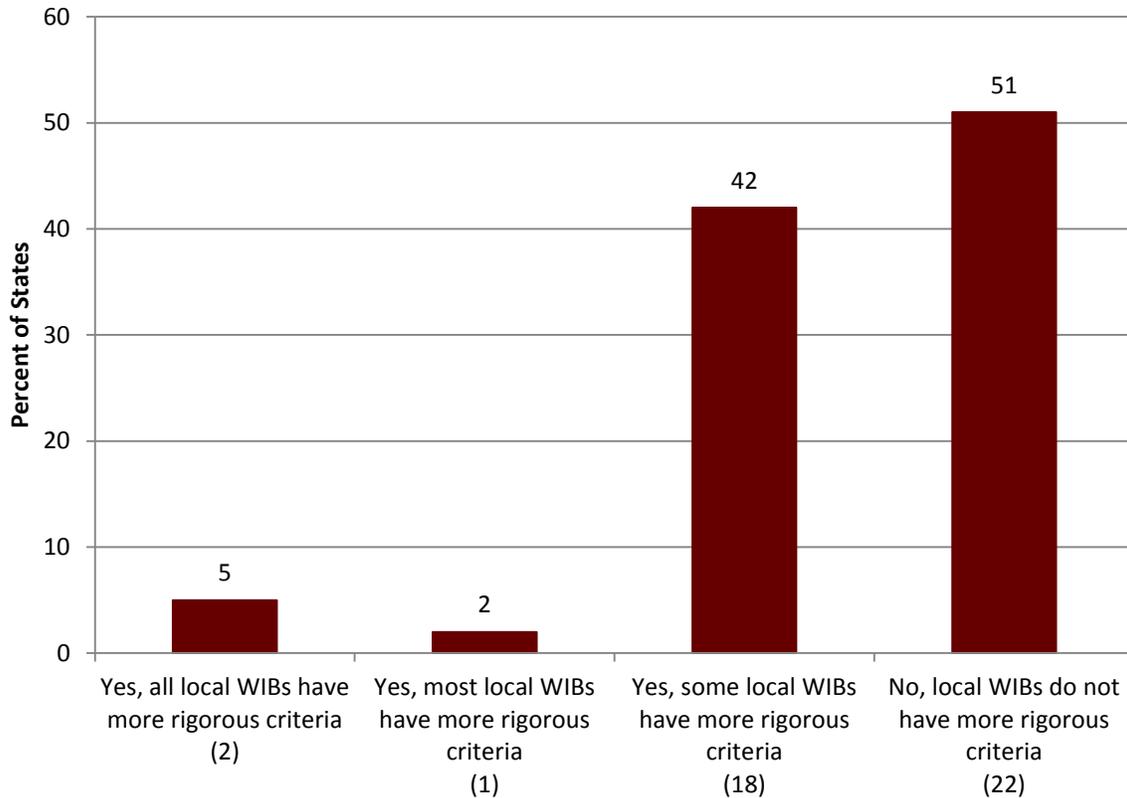
Note: Number of responses is in parentheses. Percentages are of total completed responses and may not add up to 100 percent due to rounding. Total number of states responding to this question = 45.

While the state sets minimum requirements for initial eligibility, WIA allows local WIBs to set initial eligibility criteria that are more rigorous than those at the state level. WIBs can add criteria that programs must meet to become eligible. They can also increase the standards that programs must meet on statewide criteria. Exhibit 12 summarizes whether WIBs are setting additional criteria for initial eligibility. States are evenly split between those in which WIBs have set stricter standards and those in which they have not. In 51 percent of responding states (22 states out of 43), no local WIBs have set more rigorous criteria for initial eligibility. Among respondents who said WIBs in their states have set more rigorous criteria, the majority said that only some local WIBs develop their own eligibility criteria. These findings underscore the central (often exclusive) role the state plays in setting the criteria training programs must meet to be included on the ETPL.

²¹ Previous studies have also found substantial variation in whether or not states consider program performance outcomes in determining initial eligibility. See D’Amico, 2001, *op. cit.*

Exhibit 12. Additional WIB Criteria for Initial Eligibility

Have local WIBs set initial eligibility criteria that are more rigorous than the statewide criteria?



Source: ETPL Coordinator Survey

Note: Number of responses is in parentheses. Percentages are of total completed responses and may not add up to 100 percent due to rounding. Total number of states responding to this question = 43.

5.2 Determining Subsequent Eligibility

Once approved for initial eligibility, ETP programs are able to remain on the ETPL for up to 18 months before being reviewed to ensure they meet subsequent eligibility criteria. The purpose of subsequent eligibility review is to ensure that programs continue to meet performance standards and to provide ITA participants with high-quality programs. The subsequent eligibility review requires ETPs to report program costs as well as performance on each of the WIA criteria mentioned in Section 2. This information is then compared to performance standards set by the state, and sometimes WIBs, to determine whether subsequent eligibility criteria have been met. Subsequent eligibility reviews must be conducted at least once a year. This process ensures that up-to-date performance information is regularly collected and used to assess whether ETP programs meet performance standards. Only non-waiver states must comply with subsequent eligibility requirements.

5.2.1 Subsequent Eligibility in Non-Waiver States

WIA requires that program cost information be collected as part of the subsequent eligibility process. In all 12 responding non-waiver states, either the state or all WIBs require training programs to report updated cost and tuition information as part of the process of applying for subsequent eligibility. In these states, training customers are likely to have access to up-to-date information about program costs.

As part of the subsequent eligibility review, WIA also requires that ETP programs meet performance standards on specific criteria. Although WIA specifies these criteria, it is up to states to set minimum performance standards for each criterion. Understanding variation in subsequent eligibility performance standards across the responding non-waiver states provides an opportunity to examine the extent to which states are using subsequent eligibility to ensure the quality of ETP programs.

Exhibit 13 lists minimum subsequent eligibility performance standards from responding states. Our data support previous research, which found substantial variation in these requirements.²² For example, the minimum rate of retention in employment at six months for WIA participants ranges from zero to 82 percent, with limited clustering in between. Similarly, the minimum unsubsidized employment rate for WIA participants ranges from 30 to 80 percent and shows little clustering within this range. Additionally, the minimum rate of licensure, certification, or degree attainment ranges all the way from zero to 100 percent.

This variation in performance standards suggests that, in states where standards are relatively high, subsequent eligibility reviews may ensure the quality of ETP programs. However, in some states, the standards may be sufficiently low that they are ineffective.

WIA Subsequent Eligibility Performance Criteria

- *Minimum completion rates for ALL program participants*
- *Minimum unsubsidized employment rate for ALL program participants*
- *Minimum wages at placement for ALL program participants*
- *Minimum unsubsidized employment rate for WIA participants who completed the program*
- *Minimum rate of retention in employment at six months for WIA participants who completed the program*
- *Minimum average wages at six months for WIA participants who completed the program*
- *Minimum rate of licensure, certification, attainment of degrees, or attainment of other industry-recognized credentials for WIA participants who completed the program*

²² D'Amico and Salzman, 2004, *op. cit.*

Exhibit 13. Subsequent Eligibility Criteria

Criteria	Reported Performance Standards	Number of Responses
Minimum completion rate for ALL program participants	0% 20% 40% 55% 70% 20% (degree bearing) / 50% (all others)	7
Minimum unsubsidized employment rate for ALL program participants	50% 60% 66% 68% 70% 80%	6
Minimum wages at placement for ALL program participants	\$0 \$356 \$3,878 \$5,211 (quarterly)	5
Minimum unsubsidized employment rate for WIA participants who completed the program	30% 40% 55% 68% 70% 80%	6
Minimum rate of retention in employment at six months for WIA participants who completed the program	0% 40% 65% 66% 80% 82%	6
Minimum average wages at six months for WIA participants who completed the program	\$0 \$356 \$2,000 \$4,883 \$5,211 (quarterly) \$10,888 (6 months)	6
Minimum rate of licensure, certification, attainment of degrees, or attainment of other industry-recognized credentials for WIA participants who completed the program	0% 20% 60% 65% 100%	6

Source: ETPL Coordinator Survey

For the following criteria, performance standards in some states are as low as zero, suggesting that they have no effect on ensuring the quality of ETP programs:

- Minimum completion rates for all participants
- Minimum retention in employment at six months for WIA participants
- Minimum wages at placement for all participants
- Minimum average wages at six months for WIA participants
- Minimum rate of licensure, certification, and attainment of degrees for WIA participants

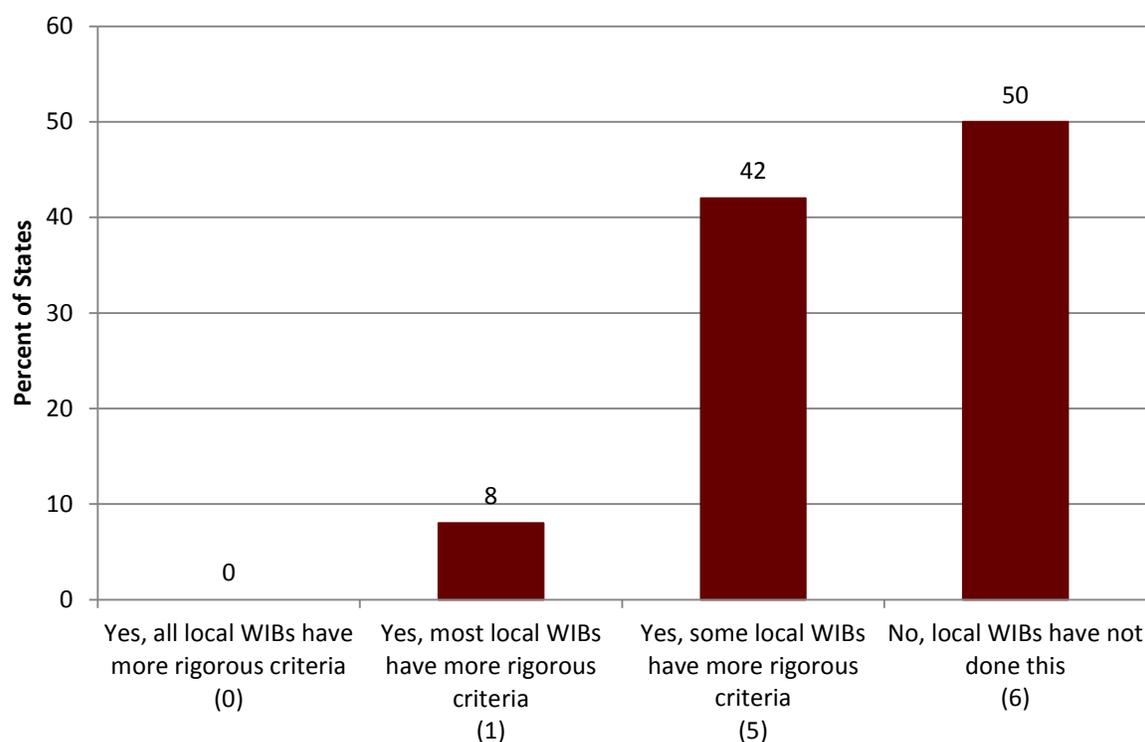
Variation in performance standards is also evident for the criteria related to minimum wages at placement for all program participants and for WIA participants. For these criteria, variation in performance standards is due in part to the fact that states are measuring these wages differently. In some states, wages are measured quarterly; in others, they are measured cumulatively over a six-month period. In still others, states appear to be relying on a weekly wage.

While the ranges of performance standards are generally very large across criteria, some criteria do have narrower ranges. For example, performance standards for the minimum unsubsidized employment rate for all program participants range between 50 and 80 percent, with most responding states setting performance standards between 60 and 70 percent.

WIA provides flexibility for states to set additional subsequent eligibility criteria. No responding states have set additional statewide criteria for programs to maintain subsequent eligibility. WIA also allows local WIBs to set subsequent eligibility criteria that are more rigorous than the statewide criteria. Exhibit 14 breaks down the percentage of responding states in which local WIBs have set criteria that are more rigorous than the state. In 50 percent of responding non-waiver states (six states out of 12), no local WIBs have set more rigorous subsequent eligibility criteria. In 42 percent of these states (five out of 12), *some* WIBs have set criteria that are more rigorous. Only one responding state noted that most WIBs have set criteria that are more rigorous, and no respondents said that all local WIBs have set more rigorous criteria. These results are very similar to those reported for initial eligibility, where 51 percent of responding states (22 out of 43) said no local WIBs have set more stringent eligibility criteria, while 42 percent (18 states out of 43) said *some* WIBs have. Again, the state frequently plays the central role in setting eligibility criteria. This finding is consistent with the state and WIB responsibilities outlined in the WIA regulations.

Exhibit 14. Additional WIB Criteria for Subsequent Eligibility

Have local WIBs set subsequent eligibility criteria that are more rigorous than the statewide criteria?



Source: ETPL Coordinator Survey

Note: Number of responses is in parentheses. Percentages are of total completed responses and may not add up to 100 percent due to rounding. Total number of states responding to this question = 12.

5.2.2 States with Initial Eligibility Waivers

Though subsequent eligibility review was intended to be an ongoing mechanism for ensuring that ITAs were used for high-quality training programs, the majority of states are not bound by subsequent eligibility requirements. As described in Section 2, DOL has issued initial eligibility waivers to 39 states, allowing ETP programs that were determined to be initially eligible to remain on the ETPL without subsequent review.

Waivers may have a number of implications for training customers. Because they reduce limitations on eligibility, they may allow customers more choice when selecting a training program. At the same time, previous research has found that training participants' wages after completing training tend to be lower in waiver states than in non-waiver states.²³ Because of these potential implications of waivers, it is important to understand why states request them and how waivers relate to ETP program performance standards.

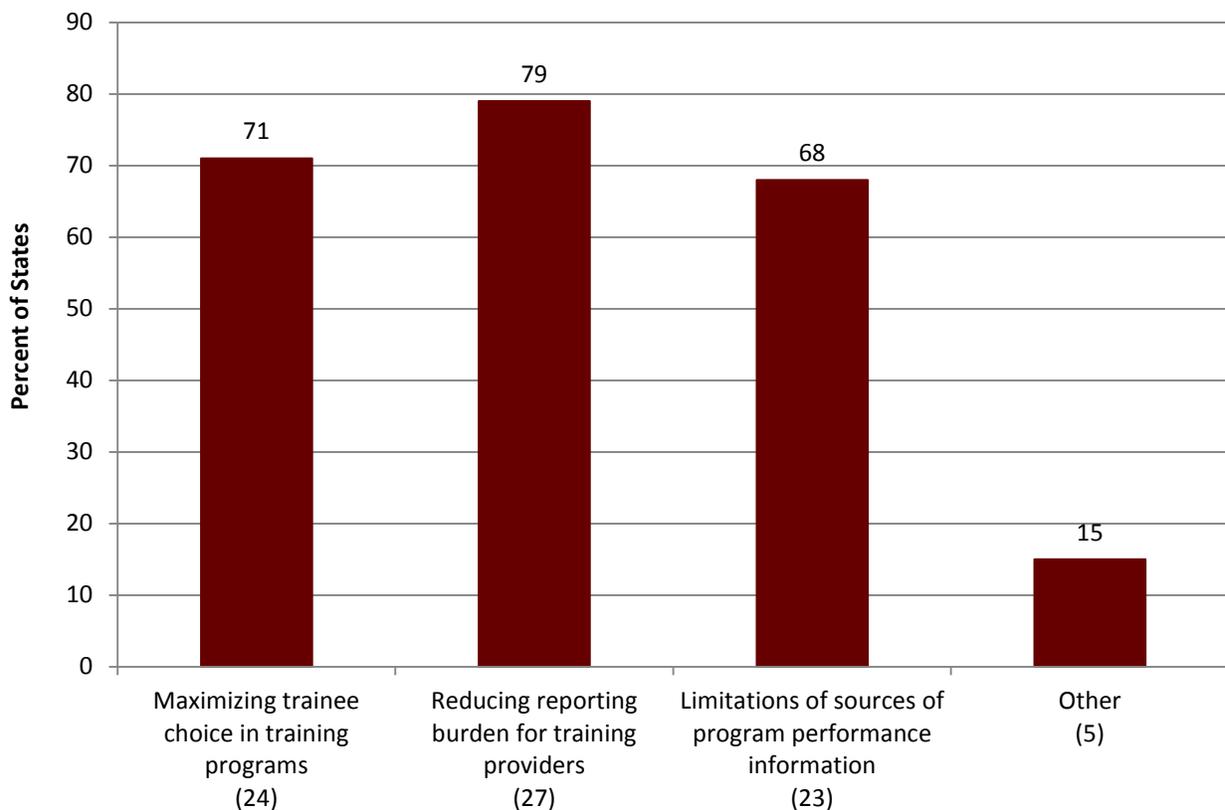
²³ Eyster, 2011, *op. cit.*

Exhibit 15 summarizes why states request initial eligibility waivers. The most frequent reason responding waiver states requested a waiver was to reduce the reporting burden associated with subsequent eligibility. Among the 34 responding waiver states, 79 percent (27 states) noted that one reason for requesting the waiver was to reduce the reporting burden for training providers. This finding supports previous findings that states request waivers because collecting data on program participants is resource-intensive for training providers and may be a disincentive for applying to be included on the ETPL.²⁴

The most frequent reasons states requested initial eligibility waivers were to reduce reporting burden for training providers and to maximize trainee choice in training programs.

Exhibit 15. Reason for Requesting a Waiver

For which of the following reasons did the state request this waiver extending the period of initial eligibility?



Source: ETPL Coordinator Survey

Note: Number of responses is in parentheses. Percentages are of total completed responses. The total percentage is greater than 100% because respondents were able to select more than one option. Total number of states responding to this question = 34.

²⁴ Decker and Perez-Johnson, 2004, *op. cit.*

Of the 34 responding waiver states, 71 percent (24 states) also requested the waiver in order to maximize trainee choice in training programs. This response reflects the findings of previous studies that many states anticipate a drop in the number of ETPs at subsequent eligibility review because providers are unwilling or unable to provide performance data.²⁵ Additionally, some programs might not be able to meet subsequent eligibility performance criteria and would be removed from the list. Both of these dynamics could reduce the number of programs on the ETPL. In 68 percent of responding waiver states (23 states out of 34), limitations on available sources of program performance information were an important reason for requesting a waiver.

Despite the fact that many responding waiver states noted limitations on performance data and the desire to reduce reporting burden as reasons for requesting a waiver, many nevertheless continue to collect ETP program cost and performance information after initial eligibility. A number of these states are then using these data to decide whether ETP programs should remain on the ETPL, despite the fact that the waiver removes any federal obligation to do so. Essentially, some waiver states are developing many of the same eligibility structures as states without a waiver. However, as described below, the cost and performance data being collected in waiver states is often less comprehensive than the data being collected in non-waiver states.

Many waiver states are developing data collection and performance standard structures that are similar to those adopted in non-waiver states.

Exhibit 16 shows the percentage of waiver states that continue to collect ETP program cost and tuition information after initial eligibility. In 61 percent of responding waiver states (20 states out of 33), the state or all local WIBs collect program cost and tuition information after programs have been approved for initial eligibility. In these cases, this information is likely being collected for programs across the state. In 12 percent of responding waiver states (four states out of 33), only some WIBs require updated cost and tuition information, suggesting that information is being collected only in certain areas rather than across the state. In 27 percent of responding waiver states (nine states out of 33), updated cost and tuition information is not required at all.

The proportion of waiver states that continue to collect program cost and tuition information throughout the state after initial eligibility is substantially lower than the proportion of non-waiver states that do so. In all 12 responding non-waiver states, either the state or all local WIBs require the collection of this information. Thus, although many waiver states collect cost and tuition information after initial eligibility, this information is more likely to be collected in non-waiver states.

²⁵ D’Amico, 2001, *op. cit.*

Exhibit 16. Waiver Status and Collecting Cost and Tuition Information

Are training programs required to report updated program cost/tuition information as part of the process of applying for subsequent eligibility/after initial eligibility?	Waiver Status		
	State has a waiver	State does not have a waiver	Total
Required by the state	52% (17)	83% (10)	27
Required by all local WIBs	9% (3)	17% (2)	5
Required by some local WIBs	12% (4)	0% (0)	4
Not required by the state or WIBs	27% (9)	0% (0)	9
Total	33	12	45

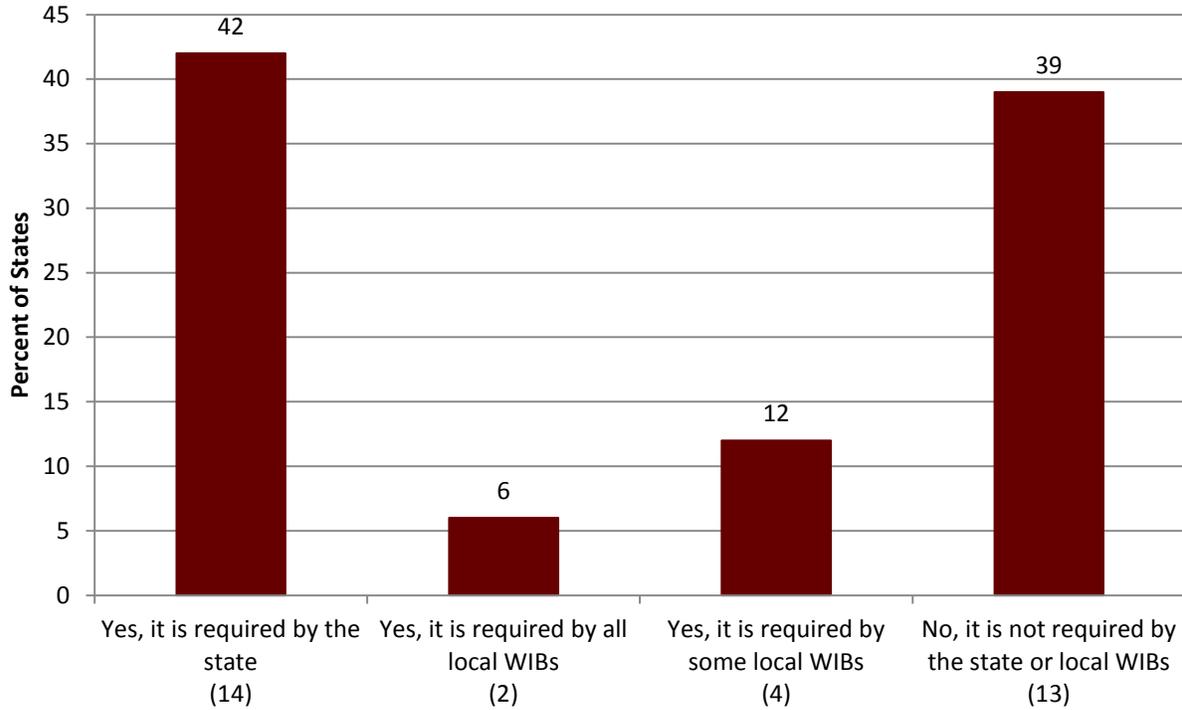
Source: ETPL Coordinator Survey

Note: Number of responses is in parentheses. Percentages are of total completed responses and may not add up to 100 percent due to rounding. Total number of states responding to this question = 45.

Exhibit 17 shows the percentage of waiver states that continue to collect ETP program performance information after initial eligibility. The survey data show that in 42 percent of responding waiver states (14 states out of 33), the state requires the collection of performance information after programs have been approved for initial eligibility. In an additional six percent (two states out of 33), all local WIBs require the collection of this information. Because all local WIBs in these states require the collection of this performance information, they are likely to cover all ETP programs throughout the state. These findings suggest that statewide ETP program performance information is collected in almost half of all waiver states after initial eligibility. In 39 percent of responding waiver states (13 states out of 33), neither the state nor local WIBs require the collection of program performance information after initial eligibility.

Exhibit 17. Collection of Performance Information in Waiver States After Initial Eligibility

Although there is a waiver in place, does the state or do any local WIBs still require the collection of performance outcome information for training programs after they have been approved for initial eligibility?



Source: ETPL Coordinator Survey

Note: Number of responses is in parentheses. Percentages are of total completed responses and may not add up to 100 percent due to rounding. Total number of states responding to this question = 33.

States collecting program performance information may use it to calculate various performance indicators. Exhibit 18 summarizes the performance indicators that waiver states reported using. The exhibit shows that a number of waiver states are measuring the WIA subsequent eligibility criteria after programs have been determined to be initially eligible. In 20 of the 33 responding waiver states, performance indicators are being measured after initial eligibility. Of these, 85 percent (17 states) are measuring program completion rates for all program participants and/or for WIA participants. A large majority—80 percent, or 16 states out of 20—are also measuring the percentage of program completers who obtain unsubsidized employment. Less than half (eight states) are measuring wages at six months. Six of the 20 states, or 30 percent, are measuring all six WIA criteria for all participants and/or for WIA participants. Additionally, performance indicators other than the WIA criteria are being measured in 73 percent of responding waiver states where performance outcomes are measured (8 states out of 11).

Exhibit 18. Performance Indicators Measured After Initial Eligibility in Waiver States

For which participants?	For those programs where performance outcome information is collected, which of the following program performance indicators are measured after initial eligibility?						
	Program Completion Rate	Percentage of Participants Who Have Obtained Unsubsidized Employment	Rate of Retention in Employment at Six Months	Wages at Placement	Wages at Six Months	Rate of Licensure, Certification, Attainment of Degrees, or Attainment of Other Industry-Recognized Credentials	Other
All program participants	60% (12)	55% (11)	15% (3)	40% (8)	10% (2)	30% (6)	25% (5)
WIA participants	45% (9)	45% (9)	40% (8)	30% (6)	35% (7)	35% (7)	30% (6)
Information not collected for this performance measure	15% (3)	20% (4)	50% (10)	40% (8)	60% (12)	40% (8)	27% (3)
States measuring this indicator for all participants or for WIA participants	85% (17)	80% (16)	50% (10)	60% (12)	40% (8)	60% (12)	73% (8)

Source: ETPL Coordinator Survey

Note: Number of responses is in parentheses. Percentages are of total completed responses. The total percentage is greater than 100% because respondents were able to select more than one option. Total number of states responding to this question = 20.

Exhibit 18 shows that waiver states are more likely to be measuring performance for WIA participants (as opposed to all participants) for some performance measures, namely:

- Rate of retention in employment at six months
- Wages at six months
- Rate of licensure, certification, attainment of degrees, or other industry-recognized credentials

This finding is not surprising—these are the three criteria for which WIA regulations require measurement only for WIA participants.

Subsequent eligibility serves as a mechanism for identifying and removing programs that do not meet quality standards on particular criteria. While waiver states are not required to comply with subsequent eligibility requirements, a number of them are nevertheless identifying and removing under-performing programs from the ETPL. Of responding waiver states where performance information is collected after initial eligibility, almost half (nine states out of 19) remove programs that fail to meet required performance standards on these indicators from the ETPL. In an additional 32 percent (6 states out of 19), WIBs vary in whether they remove programs that fail to meet performance standards. In these instances, the waiver may not be a barrier to ensuring that programs on the ETPL meet quality standards.

6. HOW DO STATES COLLECT PROGRAM DATA?

Determinations of eligibility rely on the use of accurate training program data. For example, if training providers are not systematically providing reliable program information or if WIBs and state agencies are unable to access data about trainee employment outcomes, eligibility determinations may be based on faulty information. Then qualified programs could be excluded from the ETPL or unqualified programs could be included. Additionally, because many states report the data collected for eligibility to training customers, the use of reliable data is critical to ensuring that training customers have access to accurate information when making decisions about using ITAs.

When collecting information about training programs for determining eligibility, states and WIBs often rely on a number of sources. These can include self-reported data from training providers, student records, and Unemployment Insurance (UI) wage records. Due to the limitations of self-reported data, including inaccuracies and the tendency to report data in a way that will be received favorably by reviewers, data sources such as student records and UI wage data are likely to provide more reliable information.

This section examines states' processes for collecting ETP program data at initial and subsequent eligibility review and the reasons particular data sources were chosen. It also examines these processes in waiver states that continue to collect program performance information after initial eligibility. This information provides insight into the accuracy and reliability of ETP program data.

The box below gives our key findings related to collecting ETP program data. We present more details in the remainder of the section.

Key Findings Related to Collection of ETP Program Performance Data

- The majority of responding states rely on self-reported data from training providers to determine initial eligibility and to measure program performance after initial eligibility.
- Waiver and non-waiver states use similar types of data to measure program performance after initial eligibility.
- The most frequently cited factor influencing decisions about which data to use to measure performance was the availability of the data. The next most common factors were the data reporting burden for training providers and the accuracy of the data.

6.1 Data for Determining Initial Eligibility

Exhibit 19 summarizes the data used for measuring whether or not training programs meet initial eligibility criteria. The most commonly used data source among responding states is self-reported data from training providers, used in part or in full by 87 percent of responding states (39 states out of 45) to determine whether programs meet initial eligibility criteria. Of the 45 responding states, 27 percent (12 states) are using student records to assess initial eligibility criteria and 24 percent (11 states) are using UI wage records.

Both waiver and non-waiver states rely heavily on self-reported data to measure initial eligibility criteria. However, non-waiver states are more likely to be using student records and UI wage records, perhaps because non-waiver states are collecting program performance outcome information for subsequent eligibility and thus have both the need and the capacity to use more reliable data sources.

Exhibit 19. Data Sources for Measuring Initial Eligibility Criteria

Which of the following data sources are used to measure whether providers meet initial eligibility criteria?	Waiver Status		
	State has a waiver	State does not have a waiver	Total
Self-reported data from training providers	88% (29)	83% (10)	39
Student records (e.g., program completion, courses completed, etc.)	18% (6)	50% (6)	12
UI wage records	21% (7)	33% (4)	11
Other	27% (9)	8% (1)	10

Source: ETPL Coordinator Survey

Note: Number of responses is in parentheses. Percentages are of total completed responses. The total percentage is greater than 100% because respondents were able to select more than one option. Total number of states responding to this question = 45 (33 waiver states and 12 non-waiver states).

6.2 Data for Measuring Program Performance after Initial Eligibility

Exhibit 20 compares the data sources used by responding non-waiver states to measure subsequent eligibility with the data sources used by responding waiver states that measure program performance after initial eligibility. These states are using similar data sources to measure program performance after initial eligibility. In both, about three-quarters use self-reported data from training providers, while about 35 percent use student records and half use UI wage data. This finding suggests that waivers may not substantially influence the reliability of performance information collected after initial eligibility.

Waiver and non-waiver states are using similar data to measure program performance after initial eligibility.

Exhibit 20. Data for Measuring Performance After Initial Eligibility

Which of the following data sources are used to measure program performance after initial eligibility?	Waiver Status		
	State has a waiver	State does not have a waiver	Total
Self-reported data from training providers	74% (14)	75% (9)	23
Student records (e.g., program completion, courses completed, etc.)	37% (7)	33% (4)	11
UI wage records	53% (10)	50% (6)	16
Other	21% (4)	25% (3)	7

Source: ETPL Coordinator Survey

Note: Number of responses is in parentheses. Percentages are of total completed responses. The total percentage is greater than 100% because respondents were able to select more than one option. Total number of states responding to this question = 31 (19 waiver states and 12 non-waiver states).

Exhibit 21 summarizes the factors states consider when deciding which data to use to measure performance after initial eligibility. For both waiver and non-waiver states, the most common consideration is the availability of data. Among responding waiver states, 89 percent (16 states out of 18) identified data availability as an important consideration compared with 92 percent of responding non-waiver states (11 states out of 12). At least half of responding states noted the importance of reducing data reporting burden for training providers. However, responding waiver states were more likely to cite this concern than were responding non-waiver states, perhaps due to differences in mechanisms for gathering ETP program performance data between waiver and non-waiver states. The ETPL Coordinator Survey did not specifically ask about mechanisms for gathering performance data; however, this was addressed in the follow-up calls discussed in Section 12. Exhibit 21 also shows that the accuracy of the data was an important consideration for a number of states in determining which data sources to use. Data accuracy was cited more often by responding waiver states than non-waiver states.

Exhibit 21. Reasons for Selecting Data Sources by Waiver Status

Which factors were the most important in determining which data source(s) to use for measuring program performance after initial eligibility?	Waiver Status		
	State has a waiver	State does not have a waiver	Total
Availability of the data	89% (16)	92% (11)	27
Reducing data reporting burden for training providers	67% (12)	50% (6)	18
Legislative limitations on data use (e.g., FERPA, UI wage data regulations)	44% (8)	42% (5)	13
Accuracy of the data	56% (10)	42% (5)	15
Other	6% (1)	8% (1)	2

Source: ETPL Coordinator Survey

Note: Number of responses is in parentheses. Percentages are of total completed responses. The total percentage is greater than 100% because respondents were able to select more than one option. Total number of states responding to this question = 30 (18 waiver states and 12 non-waiver states).

7. HOW IS PROGRAM PERFORMANCE REPORTED?

The ability of training customers to make informed decisions about which ETP programs are best for them depends on their ability to access accurate and comprehensive information about training programs. Having information about, for example, program cost and performance allows customers to compare programs and select an option that best matches their career goals and needs. Under WIA, the primary mechanism for providing this information is the consumer reporting system (CRS), which links approved programs to their performance outcomes. American Job Centers are required to make the CRS available. Many states also provide this information online. Under WIOA, ETPs must display program performance information through a standardized scorecard format.²⁶

In this section, we discuss topics related to program performance reporting, such as:

- The type of program information made publicly available
- The completeness of reported program performance information
- Administrative aspects of reporting program information

The box below gives our key findings related to program performance reporting. More details are presented in the remainder of the section.

Key Findings Related to Reporting ETP Program Performance

- Of responding states, 61 percent make ETP program performance information publicly available. Among states that do not currently make this information available, over half have efforts underway to do so.
- Waiver states are less likely to report performance information than non-waiver states.
- The most frequently reported performance indicators are the percentage of program participants who have obtained unsubsidized employment and the program completion rate.
- In general, performance information is not complete across ETP programs.
- A majority of responding states update publicly reported information about ETP programs at least once a year.

7.1. Program Information Made Publicly Available

Customer decisions about training programs are likely to be influenced by the program's potential to lead to successful employment outcomes. Therefore, providing trainees with this information is particularly important. Exhibit 22 summarizes the type of information about ETP programs that is made publicly available. Of the 46 responding states, 61 percent (28 states) make ETP

Waiver states are less likely than non-waiver states to make program performance information publicly available.

²⁶ Office of the Vice President of the United States. 2014. *Op cit*.

program performance information publicly available. Of responding waiver states, 59 percent (20 states out of 34) make this information available, compared with 67 percent in responding non-waiver states (eight states out of 12). Among responding states that do not currently make program outcome information available, 59 percent (10 states out of 17) said that they had efforts underway to do so.

Many responding states said that they report other information in addition to program performance. Almost all responding states make information about program cost and length publicly available. Other frequently reported pieces of information are the method of course delivery and tuition and fees. Fewer than half of responding states report information about disability adaptation, the availability of financial aid, instructor qualifications, and the availability of support services such as childcare and career counseling.

Exhibit 22. Publicly Available Information About ETP Programs

Which of the following pieces of information regarding ETP training programs are made publicly available by the state or WIBs?	% (N)
Program cost	94% (43)
Program length	94% (43)
Tuition and fees	87% (40)
Method of course delivery (e.g., online, classroom)	83% (38)
Program performance outcomes	61% (28)
Disability adaptation	35% (16)
Availability of support services (e.g., childcare, career counseling)	30% (14)
Availability of financial aid	13% (6)
Instructor qualifications	2% (1)
Other	37% (17)

Source: ETPL Coordinator Survey

Note: Number of responses is in parentheses. Percentages are of total completed responses.

The total percentage is greater than 100% because respondents were able to select more than one option. Total number of states responding to this question = 46.

States vary in terms of the performance indicators that they disseminate. Exhibit 23 summarizes the specific performance indicators that are made available. In responding states that make ETP program performance publicly available, the most commonly reported information is the program completion rate, with 93 percent of responding states (25 states out of 27) saying they report this information. Of the states that report performance, 81 percent (22 states) report the percentage of program participants who have obtained unsubsidized employment for all program participants and/or WIA participants. Wages at six months and rates of licensure, certification, and attainment of degrees are the least frequently reported performance indicators. In general, there is little difference in the percentage of states that report these indicators for all participants versus WIA participants.

Exhibit 23. Performance Information Made Publicly Available

For which participants?	Which of the following ETP program performance information is made publicly available by the state and/or WIBs?						
	Program Completion Rate	Percentage of Participants Who Have Obtained Unsubsidized Employment	Rate of Retention in Employment at Six Months	Wages at Placement	Wages at Six Months	Rate of Licensure, Certification, Attainment of Degrees, or Attainment of Other Industry-Recognized Credentials	Other
All program participants	67% (18)	59% (16)	33% (9)	48% (13)	26% (7)	30% (8)	4% (1)
WIA participants	44% (12)	40% (11)	33% (9)	22% (6)	26% (7)	26% (7)	19% (5)
Information not made publicly available	7% (2)	19% (5)	48% (13)	41% (11)	59% (16)	56% (15)	62% (8)
States reporting this indicator for all participants, for WIA participants, or both	93% (25)	81% (22)	52% (14)	59% (16)	41% (11)	44% (12)	38% (5)

Source: ETPL Coordinator Survey

Note: Number of responses is in parentheses. Percentages are of total completed responses. The total percentage is greater than 100% because respondents were able to select more than one option. Total number of states responding to this question = 27.

7.2. Completeness of Reported Program Performance Information

To make informed decisions, training customers need to be able to compare performance across the various training programs they may be considering. Therefore, it is important that performance information be publicly available for most ETP programs. Exhibit 24 summarizes the completeness of this information across programs. For each performance indicator made publicly available, the survey asked responding states to indicate the completeness of that information across programs. For all performance indicators, half or fewer of all responding states said that performance information is reported for all ETP programs. For example, among responding states where unsubsidized employment rates are publicly reported, 37 percent (7 states out of 19) said that this information is available for all programs, and 48 percent (9 states out of 19) said that it is available for half of all programs or fewer. The lack of completeness may be due to the fact that follow-up data on employment outcomes are often difficult to capture consistently if the state is relying on self-reported data, which previous exhibits show is frequently the case. These findings suggest that, even when program performance information is reported, its usefulness for training customers may be limited by its lack of completeness across programs.

Reported performance information is often incomplete across programs.

While wages at six months is among the least frequently reported performance indicators, in states where this indicator is being reported, it tends to be the most complete across programs. Among responding states that are making data on wages at six months publicly available, 82 percent (9 states out of 11) are reporting it for more than half of programs or for all programs.

As shown in Exhibit 24, the completeness of publicly reported information also varies depending on whether or not states have a waiver. Across all performance indicators, non-waiver states were more likely than waiver states to say that the indicator was reported for all programs or more than half of all programs.

Exhibit 24. Completeness of Reported Performance Information Across Programs

Waiver Status	Of all programs on the ETPL, for what portion is performance information reported for each of the following indicators?				
	Information reported for all programs	Information reported for more than half but not all programs	Information reported for about half of programs	Information reported for less than half of programs	Total
Program completion rate					
Waiver	50% (7)	21% (3)	0% (0)	29% (4)	14
No waiver	50% (4)	25% (2)	0% (0)	25% (2)	8
Total	50% (11)	23% (5)	0% (0)	27% (6)	22
Percentage of participants who have obtained unsubsidized employment					
Waiver	42% (5)	8% (1)	17% (2)	33% (4)	12
No waiver	29% (2)	29% (2)	14% (1)	29% (2)	7
Total	37% (7)	16% (3)	16% (3)	32% (6)	19
Rate of retention in employment at six months					
Waiver	29% (2)	29% (2)	14% (1)	29% (2)	7
No waiver	50% (3)	33% (2)	0% (0)	17% (1)	6
Total	39% (5)	31% (4)	8% (1)	23% (3)	13
Wages at placement					
Waiver	38% (3)	13% (1)	13% (1)	38% (3)	8
No waiver	50% (3)	33% (2)	0% (0)	17% (1)	6
Total	43% (6)	21% (3)	7% (1)	29% (4)	14
Wages at six months					
Waiver	33% (2)	33% (2)	0% (0)	33% (2)	6
No waiver	60% (3)	40% (2)	0% (0)	0% (0)	5
Total	46% (5)	36% (4)	0% (0)	18% (2)	11

Waiver Status	Of all programs on the ETPL, for what portion is performance information reported for each of the following indicators?				
	Information reported for all programs	Information reported for more than half but not all programs	Information reported for about half of programs	Information reported for less than half of programs	Total
Rate of licensure, certification, attainment of degrees, or attainment of other industry-recognized credentials					
Waiver	33% (2)	33% (2)	0% (0)	33% (2)	6
No waiver	60% (3)	20% (1)	0% (0)	20% (1)	5
Total	46% (5)	27% (3)	0% (0)	27% (3)	11

Source: ETPL Coordinator Survey

Note: Number of responses is in parentheses. Percentages are of total completed responses and may not add up to 100 percent due to rounding.

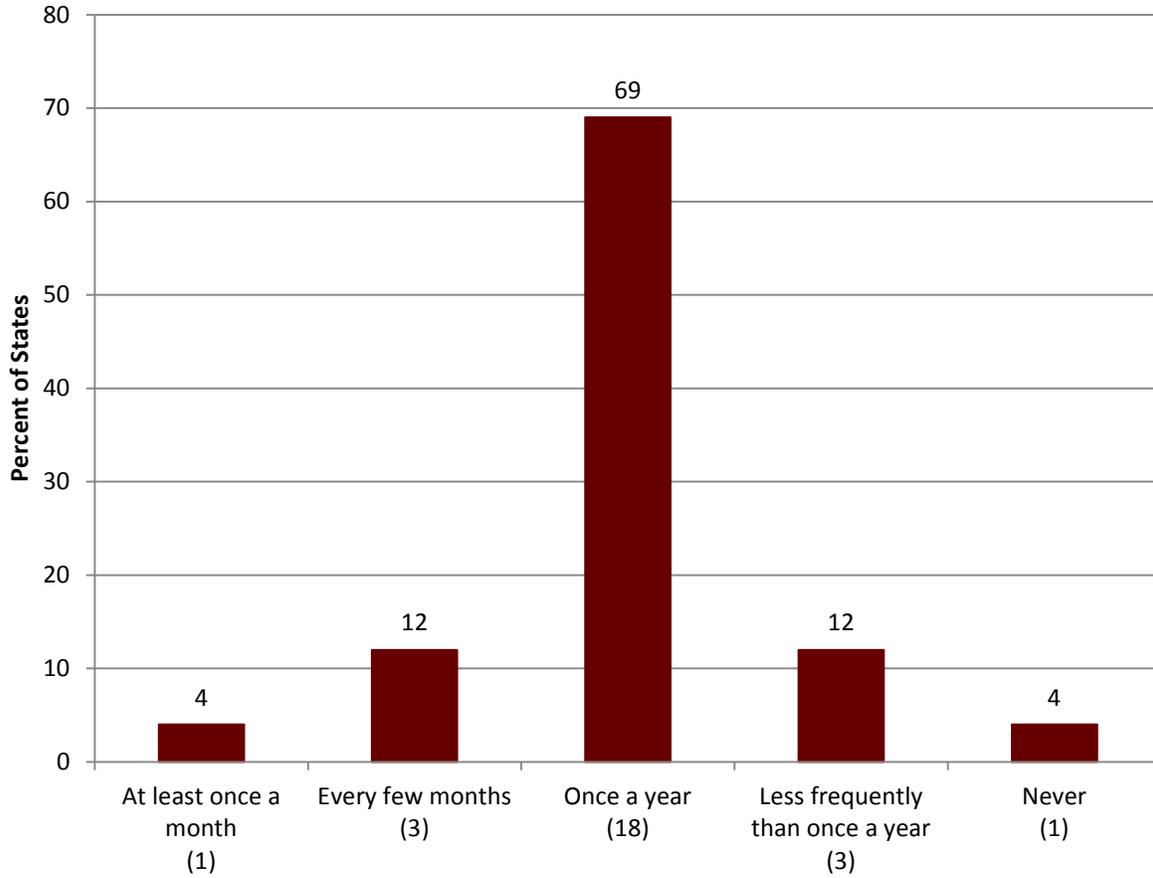
7.3. Administrative Aspects of Reporting Program Information

Among responding states that make performance information publicly available, 81 percent (21 states out of 26) said that they report the same information used to determine ETP program eligibility. However, eight percent (two states out of 26) do not use the same information, and 12 percent (three states out of 26) have local WIBs that may vary in their use of eligibility information for performance reporting.

Updating the performance data made available to potential trainees is essential to ensuring that it is accurate and relevant. Exhibit 25 shows how frequently this information is updated. Of the 26 states that make performance information publicly available, 85 percent (22 states) update this information at least once a year. This finding suggests that training customers in these states may have access to current performance information. However, one responding state never updates this information, and three do it less frequently than once per year.

Exhibit 25. Updating Publicly Available Performance Information

On average, how frequently is reported performance information about each training program updated?



Source: ETPL Coordinator Survey

Note: Number of responses is in parentheses. Percentages are of total completed responses and may not add up to 100 percent due to rounding. Total number of states responding to this question = 26.

8. WHAT ARE THE CHALLENGES OF ETPL MANAGEMENT?

Managing the ETPL presents a number of potential challenges related to working with training providers, maintaining accurate ETP program information, and coordinating between state workforce agencies and local WIBs. Improving ETPL policies and delivering relevant technical assistance requires understanding the difficulties these challenges pose to states.

In this section, we review how states rated challenges associated with specific ETPL tasks related to:

- Working with training providers
- Maintaining ETP program information
- State and local ETPL coordination

The box below gives our key findings related to the challenges of ETPL management. More details are presented in the remainder of the section.

Key Findings Related to Challenges Associated with ETPL Tasks

- Getting new providers onto the ETPL and including enough qualified providers are relatively easy for states.
- Respondents rated collecting quality data about program performance as the most difficult task.
- Tasks associated with state and local coordination are relatively easy.

8.1 Challenges in Working with Training Providers

Exhibit 26 summarizes the ease of tasks related to working with training providers. In general, various tasks related to working with training providers were relatively easy for responding states. Most responding states found it relatively easy to get new training providers onto the ETPL, with 82 percent (38 states out of 46) rating this task as easy or very easy. This finding is important, as one of the primary goals of WIA legislation is to create a marketplace of training providers and programs that can serve WIA participants. A key feature of an effective marketplace is that there are few barriers to entry.

Responding states also found it easy to include enough qualified providers on the list, with 71 percent (32 states out of 45) saying this task was easy or very easy. Including enough providers is particularly important for ensuring that training customers have sufficient choices when deciding which ETP program best meets their career goals. There was some variation among responding states based on waiver status. A

Responding states found most tasks related to working with training providers to be easy.

higher percentage of responding non-waiver states (83 percent, 10 states out of 12) said that this task was easy or very easy, compared with 67 percent (22 states out of 33) of responding waiver states. This finding runs counter to concerns discussed in previous studies that subsequent eligibility requirements would reduce the number of ETP programs below an acceptable level.²⁷

Gathering information about programs from providers was more difficult, with 60 percent of responding states (27 states out of 45) rating this task as difficult or very difficult. Waiver and non-waiver states differed in this regard. Of responding waiver states, 70 percent (23 states out of 33) rated this task as difficult or very difficult, compared with 33 percent (4 states out of 12) of responding non-waiver states. States may have requested waivers because it was hard to obtain performance and cost information, but these difficulties continued for some states despite having been granted waivers.

Communicating ETPL requirements to training providers proved to be moderately difficult, with 32 percent of responding states (15 states out of 46) rating this task as difficult or very difficult. Similarly, 27 percent of responding states (12 states out of 45) said that removing training providers from the ETPL was difficult or very difficult.

Exhibit 26. Challenges Associated with Working with Training Providers

Task	At the state level, please indicate the ease of the following tasks related to working with ETPL training providers.					Total
	Very Easy	Easy	Difficult	Very Difficult	N/A	
Getting new providers onto the ETPL	15% (7)	67% (31)	4% (2)	7% (3)	7% (3)	46
Including enough qualified providers on the ETPL	9% (4)	62% (28)	16% (7)	4% (2)	9% (4)	45
Communicating ETPL requirements to training providers	9% (4)	54% (25)	28% (13)	4% (2)	4% (2)	46
Gathering information about ETP programs from training providers	4% (2)	31% (14)	44% (20)	16% (7)	4% (2)	45
Removing training providers from the ETPL	16% (7)	51% (23)	20% (9)	7% (3)	7% (3)	45

Source: ETPL Coordinator Survey

Note: Number of responses is in parentheses. Percentages are of total completed responses and may not add up to 100 percent due to rounding.

²⁷ D’Amico, 2001, *op. cit.*

8.2 Challenges in Maintaining ETP Program Information

Exhibit 27 summarizes the ease of tasks related to maintaining ETP program information. There was substantial variation in how easy states found these tasks. Of all the challenges covered by the survey, responding states rated collecting quality data about program performance as the most difficult: 68 percent (31 states out of 46) said this task was difficult or very difficult. Responding waiver states were more likely to rate this task as difficult rather than responding non-waiver states. Perhaps non-waiver states have more developed systems in place to collect program performance data because of subsequent eligibility requirements.

Responding states rated the collection of quality data about program performance as the most difficult ETPL task.

Exhibit 27. Challenges Associated with Maintaining ETP Program Information

Task	At the state level, please indicate the ease of the following tasks related to maintaining ETP program information.					
	Very Easy	Easy	Difficult	Very Difficult	N/A	Total
Collecting quality data about ETP program performance	0% (0)	24% (11)	33% (15)	35% (16)	9% (4)	46
Ensuring that programs on the ETPL correspond to high-demand occupations	7% (3)	41% (19)	28% (13)	7% (3)	17% (8)	46
Ensuring that information about training programs on the ETPL is up-to-date	7% (3)	33% (15)	37% (17)	20% (9)	4% (2)	46
Disseminating information about training programs to training customers	11% (5)	78% (36)	7% (3)	2% (1)	2% (1)	46

Source: ETPL Coordinator Survey

Note: Number of responses is in parentheses. Percentages are of total completed responses and may not add up to 100 percent due to rounding.

Ensuring that information about ETP programs is up to date was also among the more difficult tasks: 57 percent of responding states (26 states out of 46) rated this task as difficult or very difficult. Ensuring that programs correspond to high-demand occupations was identified as a moderately challenging task, with 41 percent (19 states out of 46) rating it as easy while 28 percent (13 states out of 46) rated it as difficult.

Disseminating information about training programs to training customers was easy for responding states. This task was rated as easy or very easy by 89 percent of responding states (41 states out of 46). Only nine percent (4 states out of 46) said this task was difficult or very difficult.

8.3 Challenges Associated with State and Local ETPL Coordination

Exhibit 28 summarizes responses to questions about how difficult it is for the state to coordinate with local WIBs. The responding states indicated that state and local ETPL coordination tasks were easy, with 68 percent (31 states out of 46) saying that ensuring local WIB compliance with statewide ETP requirements was easy or very easy. Additionally, 83 percent (38 states out of 46) said that sharing information between local and state offices was easy or very easy.

Exhibit 28. Challenges Associated with State and Local ETPL Coordination

Task	At the state level, please indicate the ease of the following tasks related to <i>state and local ETPL coordination</i> .					
	Very Easy	Easy	Difficult	Very Difficult	N/A	Total
Ensuring local WIB compliance with statewide ETPL requirements	7% (3)	61% (28)	15% (7)	2% (1)	15% (7)	46
Sharing information between local and state offices	13% (6)	70% (32)	11% (5)	0% (0)	7% (3)	46

Source: ETPL Coordinator Survey

Note: Number of responses is in parentheses. Percentages are of total completed responses and may not add up to 100 percent due to rounding.

9. HOW RIGOROUS ARE STATE STANDARDS AND PRACTICES?

In creating ETPLs, WIA intended for them to provide training customers with an up-to-date list of high-quality training programs that accept ITAs. Maintaining the quality of the list requires a rigorous process in which states and/or WIBs are:

- Updating ETP program information regularly
- Removing non-compliant programs from the ETPL
- Measuring program performance using reliable data
- Using information about program performance to determine which programs are eligible to be included on the ETPL

Each of these items helps to ensure that ETP program information is current, that performance is being measured using reliable data, and that performance indicators are used to ensure ETP program quality. Together, these tasks ensure the relevance of ETPLs for training customers. An examination of the level of rigor in ETPL standards and practices across the U.S. provides a picture of the extent to which states are in fact meeting these goals. It also provides an opportunity to examine the relationships between ETPL rigor and the particular challenges states face in administering their ETPLs.

The box below gives our key findings related to the rigor of ETPL standards and practices. We present more details in the remainder of the section.

Key Findings Related to Rigor of ETPL Standards and Practices

- Non-waiver states are more likely to have rigorous ETPL standards and practices than waiver states.
- States with moderately rigorous ETPL standards and practices tend to have the most WIA exiters, followed by more rigorous states.
- In general, states with more rigorous ETPL standards and practices tend to rate relevant ETPL tasks as easier than do states with moderately rigorous and less rigorous standards and practices.

9.1 Measuring the Rigor of State ETPL Standards and Practices

We used the survey data to categorize responding states according to the rigor of their ETPL management standards and practices. To do so, we first examined responses to various survey items that we judged to reflect a rigorous approach to ETPL administration. For each item, we assigned a value of 1 to states whose response qualified as rigorous and a value of 0 to states whose response did not qualify. Exhibit 29 lists the specific survey items related to rigorous ETPL standards and practices, along with how we coded responses.

Exhibit 29. Items for Measuring the Rigor of ETPL Standards and Practices

Measure	Coding
How frequently does the state require the ETPL to be updated?	Once a year or more frequently = 1 Less than once a year = 0 There is no statewide minimum requirement = 0
Are non-compliant programs removed from the ETPL during the updating process?	Yes = 1 No = 0
Is performance information considered when making decisions about initial eligibility?	Yes = 1 No = 0
If performance information is considered for initial eligibility, what data are used to measure whether programs meet initial eligibility criteria?	Student records (e.g., program completion, courses completed, etc.) and/or UI wage records used in part or in whole to measure initial eligibility criteria = 1 Student records and/or UI wage records NOT used in part or in whole to measure initial eligibility criteria = 0 Program performance is not considered for initial eligibility = 0
Is ETP program performance information collected throughout the state after programs have been approved for initial eligibility?	Yes = 1 No = 0
What data are being used to measure program performance after initial eligibility?	Student records and/or UI wage records used in part or in whole to measure outcomes after initial eligibility = 1 Student records and/or UI wage records NOT used in part or in whole to measure outcomes after initial eligibility = 0 Program performance is not measured after initial eligibility = 0
Throughout the state, can programs that fail to meet performance standards be removed from the ETPL after initial eligibility?	Yes = 1 No = 0 Program performance is not measured after initial eligibility = 0

For each state, an average score was calculated based on all of the items in Exhibit 29.²⁸ Those states with scores closer to 0 were deemed to have less rigorous ETPL standards and practices, while states with scores closer to 1 were deemed more rigorous. Based on these scores, states were classified into categories of less rigorous, moderately rigorous, and more rigorous. States whose mean score was at least one standard deviation greater than average were classified as *more rigorous*. States whose mean score was at least one standard deviation less than the average were classified as *less rigorous*. States whose mean score was within one standard deviation of average were classified as *moderately rigorous*.

²⁸ If the respondent selected “other” for the question about how frequently the state requires the ETPL to be updated or declined to answer a particular question, these items were not included in the calculation.

Exhibit 30 illustrates the distribution of states across these groupings of rigor. It shows that non-waiver states are more likely to fall into the more rigorous category than waiver states. This distribution is largely driven by the fact that these states are required to collect performance information after initial eligibility and to use that information to remove under-performing programs. In addition, non-waiver states are more likely to consider performance outcomes when making determinations about initial eligibility.

Exhibit 30. Categories of Rigor of ETPL Standards and Practices

Category	All States	Waiver States	Non-Waiver States
Less rigorous	11% (5)	15% (5)	0% (0)
Moderately rigorous	65% (30)	68% (23)	58% (7)
More rigorous	24% (11)	18% (6)	42% (5)

Source: ETPL Coordinator Survey

Note: Number of states is in parentheses. Percentages may not add up to 100 percent due to rounding.

To ensure the validity of the rigor categories, we compared the distribution of states across these groupings to patterns of responses to the questions used to create these categories. Exhibit 31 illustrates the distribution of these items across rigor categories. States that fall into the more rigorous category are all removing non-compliant programs from the ETPL during updating, considering performance information at initial eligibility, collecting performance information after initial eligibility, and using UI and/or student records to measure performance after initial eligibility. Among those in the moderately rigorous category, almost all are removing non-compliant programs from the ETPL during the updating process, and more than half are updating their ETPL at least once a year. However, not all moderately rigorous states are considering program performance information in determining initial eligibility. Most are collecting performance information after initial eligibility, and almost half are removing programs that fail to meet performance standards. Among the less rigorous states, none are updating the ETPL annually, considering program performance at initial eligibility, or measuring performance after initial eligibility.

Exhibit 31. Responses to Items Comprising Rigor Measurement Across Rigor Categories

Measure	State Rigor Category			
	Less Rigorous	Moderately Rigorous	More Rigorous	Total
Update the ETPL at least once a year	0% (0)	62% (16)	90% (9)	25
Remove non-compliant programs from the ETPL during the updating process	75% (3)	93% (28)	100% (11)	42
Consider program performance when making determinations about initial eligibility	0% (0)	47% (14)	100% (11)	26
Consider program performance at initial eligibility <i>and</i> use student records and/or UI wage data to measure whether programs meet initial eligibility criteria	0% (0)	17% (5)	73% (8)	13
Collect ETP program performance outcome information throughout the state after programs have been approved for initial eligibility	0% (0)	59% (17)	100% (11)	28
Use student records and/or UI wage data to measure performance outcomes after initial eligibility	0% (0)	31% (9)	100% (11)	20
Remove programs that fail to meet performance outcome standards after initial eligibility	0% (0)	45% (13)	73% (8)	21

Source: ETPL Coordinator Survey

Note: Number of states is in parentheses.

One issue to consider is that the size of the WIA program may influence the rigor of ETPL practices. States with larger WIA populations may have more training programs for which they must capture performance and cost information. The scale of the task may make it more difficult to implement rigorous ETPL standards and practices. However, if a state has more WIA participants, training providers may see greater benefits to listing their programs on the ETPL and be willing to follow more rigorous standards to do so. The number of WIA exiters²⁹ in program year 2012 is used as a proxy for the current size of the WIA program in each responding state. Exhibit 32 shows the average number of WIA exiters for states across each rigor category. Less

²⁹ Exiters are defined as jobseekers who have not received services for a specified period (typically 90 days) and who had no planned gap in services. The date of exit is defined as the last date services were received.

rigorous states tend to have the fewest WIA exiters on average (2,675) while moderately rigorous states have the most (30,589).

Exhibit 32. Rigor Categories and WIA Exiters

Rigor Category	Average Number of WIA Exiters in Program Year 2012
Less rigorous	2,675
Moderately rigorous	30,589
More rigorous	9,127

Sources: ETPL Coordinator Survey and PY 2012 WIASRD Data Book³⁰

9.2 Rigor Categories and Challenges Associated with ETPL Tasks

Because they require additional information about ETP programs and take on additional ETPL tasks, states that are implementing more rigorous standards and practices are likely to face different challenges from those with less rigorous standards and practices. An understanding of how rigor relates to specific ETPL challenges is necessary to direct resources toward addressing any obstacles to increasing the rigor of ETPL standards and practices nationwide.

In general, responding states with more rigorous ETPL standards and practices found tasks associated with administering the ETPL to be easier than states with either moderately rigorous or less rigorous standards and practices. Exhibit 33 summarizes the ease of getting new providers on the ETPL by rigor categories. All less rigorous states and 91 percent of more rigorous states

In general, states with more rigorous ETPL standards and practices tended to rate relevant ETPL tasks as easier than did moderately rigorous or less rigorous states.

(10 states out of 11) said that getting new providers onto the ETPL is easy or very easy, compared with 76 percent of moderately rigorous states (23 out of 30).

³⁰ <http://www.doleta.gov/performance/results/pdf/PY2012WIASRDDataBook.pdf>

Exhibit 33. Rigor Categories and Ease of Getting New Providers on the ETPL

Rigor Category	Getting new providers on the ETPL is...					Total
	Very Easy	Easy	Difficult	Very Difficult	N/A	
Less rigorous	20% (1)	80% (4)	0% (0)	0% (0)	0% (0)	5
Moderately rigorous	13% (4)	63% (19)	7% (2)	10% (3)	7% (2)	30
More rigorous	18% (2)	73% (8)	0% (0)	0% (0)	9% (1)	11
Total	7	31	2	3	3	46

Source: ETPL Coordinator Survey

Note: Number of responses is in parentheses. Percentages are of total completed responses and may not add up to 100 percent due to rounding.

Exhibit 34 summarizes the ease of including enough qualified providers on the ETPL by rigor categories. Contrary to concerns that increased performance reporting and data requirements will discourage high-quality providers from applying to be included on the ETPL, more rigorous states are the most likely to say that including enough qualified providers on the ETPL is easy or very easy. These findings support our earlier assessment that non-waiver states, which disproportionately fall into the more rigorous category, rate these tasks to be easier than do waiver states.

Exhibit 34. Rigor Categories and Ease of Including Enough Qualified Providers on the ETPL

Rigor Category	Including enough qualified providers on the ETPL is...					Total
	Very Easy	Easy	Difficult	Very Difficult	N/A	
Less rigorous	20% (1)	40% (2)	20% (1)	0% (0)	20% (1)	5
Moderately rigorous	7% (2)	59% (17)	21% (6)	7% (2)	7% (2)	29
More rigorous	9% (1)	82% (9)	0% (0)	0% (0)	9% (1)	11
Total	4	28	7	2	4	45

Source: ETPL Coordinator Survey

Note: Number of responses is in parentheses. Percentages are of total completed responses and may not add up to 100 percent due to rounding.

Exhibit 35 summarizes the ease of gathering information about ETP programs from training providers across rigor categories. As noted in Sections 5 and 6, reducing the reporting burden for training providers was often cited as a reason both for requesting waivers and for choosing particular data sources to measure eligibility and performance outcome criteria. However, more rigorous states were more likely than moderately rigorous and less rigorous states to say that gathering information about ETP programs from training providers is easy or very easy, probably because more rigorous states are disproportionately non-waiver states, where training providers must comply with reporting requirements in order have their programs included on the ETPL. Less rigorous states are more likely than moderately rigorous states to rate gathering information about ETP programs as easy. Exhibit 36 summarizes the ease of collecting high-quality data about ETP program performance across rigor categories. While no states said that collecting quality data about ETP program performance is very easy, respondents in more rigorous states were substantially more likely to rate this task as easy compared to moderately rigorous and less rigorous states.

Exhibit 35. Rigor Categories and Ease of Gathering Information About ETP Programs

Rigor Category	Gathering information about ETP programs from training providers is...					
	Very Easy	Easy	Difficult	Very Difficult	N/A	Total
Less rigorous	0% (0)	40% (2)	20% (1)	20% (1)	20% (1)	5
Moderately rigorous	3% (1)	17% (5)	59% (17)	17% (5)	3% (1)	29
More rigorous	9% (1)	64% (7)	18% (2)	9% (1)	0% (0)	11
Total	2	14	20	7	2	45

Source: ETPL Coordinator Survey

Note: Number of responses is in parentheses. Percentages are of total completed responses and may not add up to 100 percent due to rounding.

Exhibit 36. Rigor Categories and Ease of Collecting Quality Data

Rigor Category	Collecting quality data about ETP program performance is...					
	Very Easy	Easy	Difficult	Very Difficult	N/A	Total
Less rigorous	0% (0)	0% (0)	20% (1)	60% (3)	20% (1)	5
Moderately rigorous	0% (0)	10% (3)	40% (12)	40% (12)	10% (3)	30
More rigorous	0% (0)	73% (8)	18% (2)	9% (1)	0% (0)	11
Total	0	11	15	16	4	46

Source: ETPL Coordinator Survey

Note: Number of responses is in parentheses. Percentages are of total completed responses and may not add up to 100 percent due to rounding.

10. HOW WELL IS PROGRAM PERFORMANCE REPORTED?

The ability of potential training customers to make informed decisions about using their ITA funds relies on access to accurate and up-to-date information about training programs—in other words, on high-quality ETP program performance reporting. Quality program performance reporting depends on states and/or WIBs:

- Publicly reporting outcomes for a number of performance indicators
- Providing relatively complete performance information across ETP programs
- Regularly updating reported program performance information

Without this quality information, training customers' ability to compare programs effectively is limited, and their subsequent employment outcomes may be affected. Therefore, it is critical to understand the overall quality of ETP program performance reporting and the specific challenges that states may face in developing the reporting systems required under WIOA.

To examine the distribution of responding states across reporting categories and identify the specific challenges they face, we followed a methodology similar to that used to categorize states according to the quality of their current ETP program performance reporting.

The box below gives our key findings related to the quality of ETP program performance reporting. More details are presented in the remainder of the section.

Key Findings Related to Quality of Program Performance Reporting

- Non-waiver states are more likely to have higher-quality program performance reporting than waiver states.
- States with higher-quality program performance reporting also tend to have more rigorous ETPL standards and practices.
- There were no substantial differences across reporting categories in the difficulty of related ETPL tasks. However, states with higher-quality reporting did rate some tasks to be slightly easier than did states with moderate- and lower-quality reporting.

10.1 Measuring the Quality of Current Program Performance Reporting

Similarly to how we grouped states according to the rigor of their ETPL management standards and practices, we used the survey data to categorize responding states according to the quality of their current program performance reporting. Exhibit 37 lists the specific survey items we used.

Exhibit 37. Items for Measuring Quality of Program Performance Reporting

Reporting Measure	Coding
Is program performance currently made publicly available by the state and/or WIBs?	Yes = 1 No = 0
Which of the following WIA performance criteria are being reported for all participants and/or WIA participants?	
Program completion rate	Yes = 1 No = 0
Percentage of participants who have obtained unsubsidized employment	Yes = 1 No = 0
Rate of retention in employment at six months	Yes = 1 No = 0
Wages at placement	Yes = 1 No = 0
Wages at six months	Yes = 1 No = 0
Rate of licensure, certification, attainment of degrees, or attainment of other industry-recognized credentials	Yes = 1 No = 0
For each of the performance criteria, for what portion of ETP programs is performance information reported?	All programs or more than half but not all programs = 1 About half or less than half of all programs = 0
On average, how frequently is reported performance information about each training program updated?	Once a year or more frequently = 1 Less frequently than once a year = 0

As before, we calculated an average score for each state based on all of these survey items;³¹ we then classified states with high scores (at least one standard deviation above average) as having higher-quality reporting, states with a score of 0 as having lower-quality reporting, and the states in the middle as having moderate-quality reporting. Exhibit 38 illustrates the distribution of states across these categories. It also shows that non-waiver states are more likely to fall into the category of higher-quality reporting than are waiver states.

Exhibit 38. Categories of Quality of Performance Reporting

Category	All States	Waiver States	Non-Waiver States
Lower-quality reporting	39% (18)	41% (14)	33% (4)
Moderate-quality reporting	41% (19)	47% (16)	25% (3)
Higher-quality reporting	20% (9)	12% (4)	42% (5)

Source: ETPL Coordinator Survey

Note: Number of states is in parentheses. Percentages may not add up to 100 percent due to rounding.

As with the rigor categories, we ensured the validity of the groupings by comparing the distribution of states across these categories with patterns of responses to the survey questions used to create the categories. Exhibit 39 illustrates this distribution. States in the higher-quality reporting category are generally reporting information for all WIA performance criteria. Of the nine states in this category, 89 percent (eight states) are updating the reported performance information at least once a year. States in the moderate-quality reporting category also tend to update reported performance information regularly; however, they are reporting fewer outcomes and providing less complete information to potential training customers. Finally, states in the lower-quality reporting category are not currently making any program performance information publicly available.

³¹ If the respondent declined to answer a question, these items were not included in the calculation.

Exhibit 39. Responses to Items Comprising Quality of Performance Reporting Measurement Across Categories

Measure	Reporting Quality Category			
	Lower-Quality Reporting	Moderate-Quality Reporting	Higher-Quality Reporting	Total
Percentage of states where performance outcomes are made publicly available by the state and/or WIBs	0% (0)	100% (19)	100% (9)	28
Average number of WIA performance outcomes that are reported (out of six)	0 (0)	3 (19)	6 (9)	-
Average number of outcomes for which information is available for more than half or all ETP programs (out of six)	0 (0)	1 (15)	6 (8)	-
Percentage of states that update the reported ETP program performance information at least once a year	0% (0)	88% (15)	89% (8)	23

Source: ETPL Coordinator Survey
 Note: Number of states is in parentheses.

Exhibit 40 shows that there may be a relationship between the quality of ETP program performance reporting and the rigor of ETPL standards and practices. States that have higher-quality program performance reporting all fall into the moderately rigorous or more rigorous categories. However, no states with lower-quality program performance reporting all fall into the more rigorous category.

Exhibit 40. Rigor and Quality of Performance Reporting

Quality of ETP Program Performance Reporting	Rigor of ETPL Standards and Practices			
	Less Rigorous	Moderately Rigorous	More Rigorous	Total
Lower-quality reporting	22% (4)	78% (14)	0% (0)	18
Moderate-quality reporting	5% (1)	63% (12)	32% (6)	19
Higher-quality reporting	0% (0)	44% (4)	56% (5)	9
Total	5	30	11	46

Source: ETPL Coordinator Survey
 Note: Number of states is in parentheses. Percentages may not add up to 100 percent due to rounding.

10.2 Categories of Reporting Quality and Challenges of ETPL Tasks

In general, higher-quality reporting states did not tend to rate relevant ETPL tasks as being any more difficult than did moderate- or lower-quality reporting states. When there was variation across the categories, higher-quality reporting states tended to rate these tasks as slightly easier.

Exhibit 41 summarizes the ease of gathering information about ETP programs from training providers across reporting categories. There was no substantive variation in how responding states rated the difficulty of this task. Across all categories, most responding states rated this task as either easy or difficult. No higher-quality reporting states rated this task as very difficult.

Exhibit 41. Quality of Performance Reporting Categories and Ease of Collecting Program Information

Quality of ETP Program Performance Reporting	Gathering information about ETP programs from training providers is...					Total
	Very Easy	Easy	Difficult	Very Difficult	N/A	
Lower-quality reporting	6% (1)	33% (6)	39% (7)	17% (3)	6% (1)	18
Moderate-quality reporting	6% (1)	28% (5)	44% (8)	22% (4)	0% (0)	18
Higher-quality reporting	0% (0)	33% (3)	56% (5)	0% (0)	11% (1)	9
Total	2	14	20	7	2	45

Source: ETPL Coordinator Survey

Note: Number of responses is in parentheses. Percentages are of total completed responses and may not add up to 100 percent due to rounding.

There is a bit more variation in how responding states across these categories rated the ease of collecting high-quality data about ETP program performance, as summarized in Exhibit 42. All lower-quality reporting states said that collecting quality data about ETP program performance is difficult or very difficult. In these cases, the fact that program performance information is not made publicly available may be due to difficulty in accessing the data. No higher-quality reporting states said that collecting quality data about program performance is very difficult; instead, these states were relatively evenly split between rating this task as easy and as difficult.

Exhibit 42. Quality of Performance Reporting Categories and Ease of Collecting Quality Performance Information

Quality of ETP Program Performance Reporting	Collecting quality data about ETP program performance is...					Total
	Very Easy	Easy	Difficult	Very Difficult	N/A	
Lower-quality reporting	0% (0)	0% (0)	28% (5)	56% (10)	17% (3)	18
Moderate-quality reporting	0% (0)	32% (6)	32% (6)	32% (6)	5% (1)	19
Higher-quality reporting	0% (0)	56% (5)	44% (4)	0% (0)	0% (0)	9
Total	0	11	15	16	4	46

Source: ETPL Coordinator Survey

Note: Number of responses is in parentheses. Percentages are of total completed responses and may not add up to 100 percent due to rounding.

Exhibit 43 compares the ease of ensuring that information about training programs on the ETPL is up to date across reporting categories. Over 50 percent of higher-quality reporting states (five states out of nine) said that this task is easy or very easy, as compared to 31 percent of moderate-quality reporting states (six out of 19) and 35 percent of lower-quality reporting states (six out of 17).

Exhibit 43. Quality of Performance Reporting Categories and Ease of Maintaining Up-to-Date Program Information

Quality of ETP Program Performance Reporting	Ensuring that information about training programs on the ETPL is up to date is...					Total
	Very Easy	Easy	Difficult	Very Difficult	N/A	
Lower-quality reporting	6% (1)	29% (5)	35% (6)	24% (4)	6% (1)	17
Moderate-quality reporting	5% (1)	26% (5)	37% (7)	26% (5)	5% (1)	19
Higher-quality reporting	11% (1)	44% (4)	44% (4)	0% (0)	0% (0)	9
Total	3	14	17	9	2	45

Source: ETPL Coordinator Survey

Note: Number of responses is in parentheses. Percentages are of total completed responses and may not add up to 100 percent due to rounding.

Exhibit 44 compares the ease of disseminating information about training programs across reporting categories. All higher-quality reporting states said that disseminating ETP program information to customers is easy. Of the 19 moderate-quality reporting states, 85 percent (16 states) rated this task as easy or very easy, as did 89 percent of lower-quality reporting states (16 out of 18). This finding suggests that reporting ETP program outcomes may not create a greater burden for ETPL coordinators in higher-quality reporting states than in other states.

Exhibit 44. Quality of Performance Reporting Categories and Ease of Disseminating Program Information

Quality of ETP Program Performance Reporting	Disseminating Information about training programs to customers is...					
	Very Easy	Easy	Difficult	Very Difficult	N/A	Total
Lower-quality reporting	17% (3)	72% (13)	6% (1)	6% (1)	0% (0)	18
Moderate-quality reporting	11% (2)	74% (14)	11% (2)	0% (0)	5% (1)	19
Higher-quality reporting	0% (0)	100% (9)	0% (0)	0% (0)	0% (0)	9
Total	5	36	3	1	1	46

Source: ETPL Coordinator Survey

Note: Number of responses is in parentheses. Percentages are of total completed responses and may not add up to 100 percent due to rounding.

11. HOW CENTRALIZED IS ETPL ADMINISTRATION?

WIA provides substantial flexibility for states to make decisions about whether various ETPL tasks are conducted at the state and/or WIB level. At times, both entities perform different aspects of these tasks. However, the degree of centralization may influence ETPL rigor and ETP program performance reporting. It may also pose specific challenges for how ETPLs are managed.

Using data from the ETPL Coordinator Survey, this section explores these dynamics. The box below gives our key findings related to centralization of ETPL administration. More details are presented in the remainder of the section.

Key Findings Related to the Centralization of ETPL Administration

- There does not appear to be a relationship between centralization of ETPL administration and waiver status.
- More centralized states tend to be more rigorous and have higher-quality performance reporting.
- The degree of centralization does not appear to correlate with the difficulty of state and local ETPL coordination.

11.1 Measuring the Degree of Centralization of ETPL Administration in States

The ETPL Coordinator Survey asked states whether each of the following tasks associated with ETPL administration is conducted by the state, WIBs, or both:

- Setting program eligibility criteria
- Verifying that programs are eligible to be included on the ETPL
- Updating the ETPL
- Reporting program performance

In order to categorize responding states according to their degree of centralization, IMPAQ grouped states based on their responses to these questions. For each of the tasks listed above, the state was assigned a value of 1 if the task was conducted only at the WIB level, a 2 if the task was conducted at both the state and WIB levels, and a 3 if the task was conducted only at the state level.

For each responding state, we calculated an average score based on all of these items.³² We considered states with scores closer to 1 to be more decentralized while states with a score closer to 3 were considered to be more centralized.

³² If the respondent declined to answer a question, these items were not included in the calculation.

For the rigor and performance reporting categories described in Sections 9 and 10, we used standard deviations, in combination with an examination of response patterns, to categorize states. We used this process in part because the scores on the rigor and quality of data reporting scales had no inherent meaning. However, this is not the case for the current scale. An average score of 1 on the centralization scale means that all key tasks associated with ETPL administration are conducted at the WIB level without the state, and ETPL administration is completely decentralized. An average score of 3 means that all key tasks are conducted at the state level without WIBs, and ETPL administration is completely centralized. To account for this feature of the average scores, we used a slightly different method to group states. States with average scores of 1 and 3 were grouped into categories representing complete decentralization and complete centralization, respectively. States with scores between 1 and 3 were grouped into three categories of centralization, centered on the midpoint value of 2, which we designated as an intermediate level of centralization. The other two categories are primarily decentralized and primarily centralized.

The complete set of centralization categories is shown in Exhibit 45. Only a small portion of responding states are either completely decentralized (4 percent, two states out of 46) or completely centralized (13 percent, six states out of 46). The majority fall in the middle categories, with the largest group of states falling into the primarily centralized group (43 percent, 20 states out of 46). There are few differences between waiver and non-waiver states, though non-waiver states are slightly more likely to be either primarily or completely centralized than waiver states.

Exhibit 45. Centralization Categories

Average Score	Degree of Centralization	All States	Waiver States	Non-Waiver States
1	Completely decentralized	4% (2)	6% (2)	0% (0)
1 – 1.9	Primarily decentralized	22% (10)	24% (8)	17% (2)
2	Intermediate	17% (8)	18% (6)	17% (2)
2.1 – 2.9	Primarily centralized	43% (20)	41% (14)	50% (6)
3	Completely centralized	13% (6)	12% (4)	17% (2)

Source: ETPL Coordinator Survey

Note: Number of states is in parentheses. Percentages may not add up to 100 percent due to rounding.

Exhibit 46 examines the average number of local WIBs across each centralization category. States in the completely decentralized and completely centralized categories have the highest number of local WIBs on average. Intermediate states have the lowest number, likely because this category includes a number of single-area states that have a state WIB but no local WIBs.

Exhibit 46. Number of WIBs and Degree of Centralization

Degree of Centralization	Average Number of Local WIBs
Completely decentralized	16
Primarily decentralized	10
Intermediate	2
Primarily centralized	13
Completely centralized	16

Exhibit 47 compares the centralization of ETPL administration with the rigor of ETPL standards and practices. States that are completely centralized are most likely to have more rigorous ETPL standards and practices, perhaps because the process for collecting and updating program information is standardized across the state. Primarily decentralized states are most likely to fall into the less rigorous category. Exhibit 48 compares the centralization of ETPL administration with the quality of program performance reporting. States that are completely or primarily centralized are more likely than those in other centralization categories to have higher-quality performance reporting. These findings suggest that centralization may be associated with both greater rigor and higher-quality performance reporting.

States that are completely centralized are most likely to have more rigorous ETPL standards and practices and higher-quality performance reporting.

Exhibit 47. Centralization Categories and Rigor of ETPL Standards and Practices

Centralization Category	Rigor Category			
	Less Rigorous	Moderately Rigorous	More Rigorous	Total
Completely decentralized	0% (0)	100% (2)	0% (0)	2
Primarily decentralized	20% (2)	60% (6)	20% (2)	10
Intermediate	13% (1)	75% (6)	13% (1)	8
Primarily centralized	5% (1)	75% (15)	20% (4)	20
Completely centralized	17% (1)	17% (1)	67% (4)	6
Total	5	30	11	46

Source: ETPL Coordinator Survey

Note: Number of states is in parentheses. Percentages may not add up to 100 percent due to rounding.

Exhibit 48. Centralization Categories and Quality of Performance Reporting

Centralization Category	Quality of ETP Program Performance Reporting			
	Lower-Quality Reporting	Moderate-Quality Reporting	Higher-Quality Reporting	Total
Completely decentralized	0% (0)	100% (2)	0% (0)	2
Primarily decentralized	70% (7)	30% (3)	0% (0)	10
Intermediate	50% (4)	50% (4)	0% (0)	8
Primarily centralized	30% (6)	40% (8)	30% (6)	20
Completely centralized	17% (1)	33% (2)	50% (3)	6
Total	18	19	9	46

Source: ETP Coordinator Survey

Note: Number of states is in parentheses. Percentages may not add up to 100 percent due to rounding.

11.2 Centralization and Challenges Associated with ETP Tasks

The degree of centralization does not necessarily correlate with the difficulty of conducting tasks related to state and local ETP coordination. The relationship between degree of centralization and the ease of ensuring local WIB compliance with statewide ETP requirements is summarized in Exhibit 49. There is limited variation in how respondents in each centralization category rated the ease of ensuring local WIB compliance with statewide ETP requirements. About 80 percent of primarily decentralized, primarily centralized, and completely centralized states rated this task as easy or very easy; completely centralized states were most likely to rate this task as very easy. However, for the one completely decentralized state that rated this task, ensuring local WIB compliance is very difficult. Exhibit 50 summarizes the relationship between the degree of centralization and the ease of sharing information between local and state offices. This task was rated as relatively easy across all categories other than completely decentralized. Overall, the degree of centralization seems to have a limited correlation with the ease or difficulty of tasks related to state and local ETP coordination.

Exhibit 49. Centralization Categories and Ease of Ensuring WIB Compliance

Centralization Category	Ensuring local WIB compliance with statewide ETPL requirements is...					Total
	Very Easy	Easy	Difficult	Very Difficult	N/A	
Completely decentralized	0% (0)	0% (0)	0% (0)	50% (1)	50% (1)	2
Primarily decentralized	0% (0)	80% (8)	10% (1)	0% (0)	10% (1)	10
Intermediate	0% (0)	25% (2)	13% (1)	0% (0)	63% (5)	8
Primarily centralized	5% (1)	75% (15)	20% (4)	0% (0)	0% (0)	20
Completely centralized	33% (2)	50% (3)	17% (1)	0% (0)	0% (0)	6
Total	3	28	7	1	7	46

Source: ETPL Coordinator Survey

Note: Number of responses is in parentheses. Percentages are of total completed responses and may not add up to 100 percent due to rounding.

**Exhibit 50. Centralization Categories and Ease of Sharing Information Between
Local and State Offices**

Centralization Category	Sharing information between local and state offices is...					Total
	Very Easy	Easy	Difficult	Very Difficult	N/A	
Completely decentralized	0% (0)	0% (0)	50% (1)	0% (0)	50% (1)	2
Primarily decentralized	0% (0)	100% (10)	0% (0)	0% (0)	0% (0)	10
Intermediate	38% (3)	38% (3)	13% (1)	0% (0)	13% (1)	8
Primarily centralized	5% (1)	75% (15)	15% (3)	0% (0)	5% (1)	20
Completely centralized	33% (2)	67% (4)	0% (0)	0% (0)	0% (0)	6
Total	6	32	5	0	3	46

Source: ETPL Coordinator Survey

Note: Number of responses is in parentheses. Percentages are of total completed responses and may not add up to 100 percent due to rounding.

12. EXPERIENCES OF ETPL COORDINATORS AND TRAINING PROVIDERS

12.1 Background

As a follow-up to the ETPL Coordinator Survey, IMPAQ held short discussions with state- and local-level ETPL coordinators and training providers in three states. The purpose of these discussions was to provide context for the findings from the ETPL Coordinator Survey. The survey provided us with information about current state and WIB practices related to administering ETPLs, determining ETP program eligibility, and reporting information about ETP programs. However, in order for us to understand how and why ETPL administrators implemented certain practices and the challenges that they faced in doing so, we needed to speak with state and local staff as well as training providers that have programs on the ETPL. The information that we gathered from these additional discussions may inform DOL's efforts to prepare states, WIBs, and training providers for the new ETP program performance requirements associated with WIOA.

As described in Sections 9 to 11, we used data from the ETPL Coordinator Survey to categorize states according to the rigor of their ETPL practices, quality of reporting, and centralization of their ETPL administration in relation to the other responding states. We then worked with DOL to select three states that exhibited various combinations of these characteristics and waiver status. In choosing the states, we focused on ensuring that various characteristics related to ETPL administration were represented. Exhibit 51 summarizes the characteristics of the selected states.³³

Exhibit 51. Characteristics of Selected States

State	Degree of Centralization	Rigor of ETPL Practices	Quality of Reporting	Waiver Status
A	Primarily Decentralized	Low	Low	Waiver
B	Completely Centralized	High	High	Waiver
C	Completely Centralized	High	High	No Waiver

After choosing three states, we conducted follow-up discussions with ETPL coordinators and training providers. In each state, we spoke with the state ETPL coordinator, up to four local ETPL coordinators, and up to two training providers with programs listed on the ETPL, conducting a total of 18 discussions. We selected WIBs and training providers for discussions through convenience sampling. DOL provided us with a preliminary list of suggested WIBs and training providers. If individuals in these organizations were unavailable to speak with us, we proceeded to identify contacts in alternate WIBs via online searches and alternate training providers based

³³ To ensure anonymity, throughout this report, we have refrained from identifying these states by name. They are instead referred to by the letter in the first column of Exhibit 51.

on WIB recommendations and/or the state ETPL. We conducted these follow-up discussions in September and October 2014.

Given that the states, WIBs, and providers were selected purposively, we did not intend our findings to be representative of the whole country or even of the full range of practices within each of the selected states. Instead, we provide a broad description of examples of ETPL practices across a variety of settings.

Our discussions were unstructured and guided by the topics that participants identified as being relevant to their experience with the ETPL. When applicable, we explored key findings from the analysis of the ETPL Coordinator Survey in greater depth. For example, we further explored the processes for adding programs to the ETPL, why some states and WIBs collect ETP program performance information while others do not, challenges that the WIBs face in collecting program performance data, and how states get training providers to comply with performance reporting requirements.

Through these discussions, we identified the following common themes among participants:

- The rigor of processes for including programs on the ETPL; and,
- Challenges associated with collecting and using ETP program performance information.

In the remainder of this section, we describe these themes as they relate to processes for including programs on the ETPL and collecting and using program performance information.

12.2 Including Training Programs on the ETPL

In the ETPL Coordinator Survey, we asked about whether specific tasks are performed by WIBs and/or the state. Among these tasks, respondents indicated that verifying program eligibility for inclusion on the ETPL was the task that WIBs were involved in most frequently. In all three of the states in which we held follow-up discussions, WIBs play an important role in this process, often working with the state to determine which programs should be included on the list. However, there was substantial variation in how this process plays out.

State B, which is centralized, is the only state in which the new provider application is initially sent to the state for approval. Once the state approves providers, local WIBs then review their initial and any future program applications. In this state, WIBs are also responsible for providing the state with the justifications for denying eligibility to certain programs. In the other two states, new provider applications are initially sent to the WIB for approval. Training providers submit their application to the WIB in various formats including paper, email, a web database, and spreadsheets.

The rigor of the process used to review and approve or deny applications varies substantially across the selected states and WIBs. In some areas, this is a simple administrative task. If the information on the application meets the eligibility requirements, the program is automatically approved. In some WIBs, this task is the responsibility of dedicated “program approvers” who

may review and approve or reject each application. In one state, a WIB can ask other WIBs to complete this task for it. In doing so, it usually works with the WIB associated with the state's largest metropolitan region.

In other states and WIBs, the process to approve and deny applications is more intensive. In one case, it involves an onsite evaluation in which WIB staff assess the training provider and verify references from employers and past participants. In another instance, two staff members review the providers' applications and independently score them. This duplicative process helps to ensure that the WIB's decisions about eligibility are valid. After this process is complete, the application is passed on to the WIB's program committee and reviewed by the board, which makes the final decision about eligibility. In one WIB, staff ensure that new training providers are suitable by monitoring an applicant provider's performance data through an initial trainee observation period. During this time period, case managers enroll 10 WIA participants into the program and closely track their employment and wage outcomes to ensure that the program is performing as reported in the provider's application. Throughout our discussions, we found that those WIBs that require more rigorous application and review processes also tend to collect the most rigorous program performance data.

After a WIB approves a provider's application, the WIB forwards the application to the state, which generally plays an administrative role by providing the final sign-off on programs that have already been approved by the WIB. Local ETPL coordinators noted that there are very few instances in which the state rejects an application that has been approved by the WIB. This generally happens only when the state has information about a previous violation committed by a provider that would disqualify it from listing programs on the ETPL.

In our discussions, both training providers and ETPL coordinators at the state and local level were generally satisfied with current processes for reviewing and submitting ETP applications. Local ETPL coordinators noted that these processes were particularly effective when WIBs and training providers had access to robust online application systems. Local ETPL coordinators mentioned that these systems helped them compile ETP program information and communicate expectations to providers during the application process.

12.2.1 Initial Eligibility

As noted in Section 2, initial eligibility criteria specify the minimum standards that training programs must meet in order to be included on the ETPL. As prescribed by WIA, among the states with whom we spoke, state agencies set minimum initial eligibility criteria that all WIBs must consider when reviewing applications from providers. There were a number of common criteria for initial eligibility that were considered across these states, including the following:

- Program costs
- Duration of the training program
- Accreditation
- Evidence that the program addresses a career that is locally in-demand

- Overall good business standing

Like 49 percent of states responding to the ETPL Coordinator Survey, in the states in which we conducted follow-up calls, WIBs have the opportunity to include initial eligibility criteria that exceed those required by the state. However, we found substantial variation within and across states in whether and how WIBs expanded eligibility criteria. For example, within State A, which has a relatively decentralized ETPL administration, there were WIBs that had not set any initial eligibility criteria beyond those mandated by the state. There were also some WIBs that had included additional criteria. For example, one WIB had developed a weighted scoring system to determine initial eligibility. In this system, each applicant program received a score based on a number of factors that the WIBs considered in addition to minimum state requirements, including program performance. In this system, an applicant program can earn a score of up to 100 based on the information that providers supply. Program performance accounts for 30 of these points. To be added to the ETPL, the applicant must obtain a minimum score of 70. This means that while program performance information can influence initial eligibility, it is still possible for programs to meet the minimum threshold score without providing that information.

Local ETPL coordinators noted that variation in initial eligibility requirements within a state presents challenges. For example, if providers do not meet the eligibility criteria in one area, they may reapply in another area with less stringent requirements. This lack of consistency can mean that a WIB's efforts to ensure the quality of training programs on the ETPL may be limited by regional variation in eligibility requirements. According to local ETPL coordinators, this can also lead to confusion about eligibility criteria for providers that have locations across multiple areas within the same state. Some local ETPL coordinators mentioned that efforts to set stronger, more consistent policies on eligibility would be helpful and lend consistency to list implementation and provider quality. However, others suggested that this would overlook local variation in training needs.

WIB efforts to ensure the quality of training programs on the ETPL may be limited by regional variation in eligibility requirements that allow lower-quality programs onto the list.

12.2.2 Waivers

Among the states with whom we spoke, two had waivers of initial eligibility. These states that had obtained waivers noted that they had done so for a variety of reasons.

First, the states were concerned about the lack of infrastructure and resources to collect verifiable program performance data.³⁴ As we describe in subsequent sections, access to reliable data about training program performance can be very limited. Individuals with whom we spoke noted that self-

Initial eligibility waivers were cited as being important in rural areas in which subsequent eligibility performance criteria may disqualify the few local providers, thus limiting the number of program choices available to ITA customers.

³⁴ As noted previously, this was also a reason for requesting a waiver among 68 percent of waiver states that responded to the ETPL Coordinator Survey (see Exhibit 15).

reported data from training providers tends to be incomplete and is sometimes inaccurate. However, more reliable UI wage data are often very difficult to obtain from the state.

Second, ETPL coordinators and training providers were concerned that the performance requirements associated with subsequent eligibility would limit customer choice by reducing the number of training providers on the ETPL.³⁵ For example, in rural areas, in which the supply of training providers was limited, some local ETPL coordinators voiced concern that adding subsequent eligibility performance criteria could disqualify local providers from the ETPL and substantially limit the number of program choices available to ITA customers. However, in urban areas in which the supply of providers was greater, WIBs tended to be more amenable to implementing performance measures and using them to remove underperforming programs.

Implementing Performance Standards with a Waiver. State B, one of the waiver states with whom we spoke, recently implemented a policy to collect performance information on WIA subsequent eligibility program performance indicators and plans to use performance standards to remove programs from the ETPL. Despite the waiver, this state is essentially in the process of implementing subsequent eligibility requirements. The state's experience of transitioning to following WIA requirements for subsequent eligibility may be instructive given that waivers will be eliminated under WIOA and all current waiver states will have to undertake a similar process.

According to the state ETPL coordinator in State B, the state adopted performance standards and opted to use them to determine eligibility because of the need to ensure the quality of providers and training programs available to WIA participants. Additionally, this move was intended to align the state's requirements with federal reporting requirements and the upcoming removal of the waiver under WIOA.

Under the new policy, WIBs and training providers will collect performance data for each ETP program. The performance indicators mirror WIA criteria and are listed in Exhibit 52. These data will be collected with a program's initial application. Training providers are responsible only for reporting on performance indicators for all participants in program (the first three indicators listed in Exhibit 52). The remaining indicators are derived using UI wage data obtained from the state, which are merged with the state's case management system to calculate program performance measures for WIA participants.

Training programs for which performance data are not available for July 1 to June 30 of the previous year may be approved by the WIB and the state and receive probationary eligibility status for the first year, pending submission of or a proposed method of gathering performance data. Training providers can request an extension of the probationary eligibility for up to 18 months. Program performance will then be reviewed annually and programs that do not meet performance standards will be removed from the list. However, in the initial stages of implementation, no current programs will be removed from the list if they fail to meet these standards. According to the state ETPL coordinator, the state expects the rollout to occur over

³⁵ This was noted as a reason for requesting a waiver by 71 percent of waiver states that responded to the ETPL Coordinator Survey (see Exhibit 15).

two years. The 2014/2015 academic year will serve as a test year for the process and 2015/2016 will serve as a “warning” year for any programs with low performance. It is anticipated that this approach will give providers an opportunity to adapt to the new system. It will also provide the state with the opportunity to test and revise the performance standards.

Exhibit 52. Performance Standards in State B

Performance Indicator	Performance Standard
Program completion rate for all participants	50%
Percent of all participants who obtain unsubsidized employment	65%
Average hourly wage at placement for all participants	Minimum wage + 15%
Percent of WIA participants who obtain unsubsidized employment	50%
Retention rate in employment at six months for WIA participants	65%
Average quarterly wage at six months for WIA participants	70% of the lower living standard income level for a family of one

To determine the specific performance standards for the indicators, the state ETPL coordinator and team first researched the standards used in other states. They then compared established performance standards with findings from their own state’s data and identified thresholds that they considered to be achievable for adults, dislocated workers, and youth. Local areas’ support for this new system was enhanced by the fact that the standards were seen as achievable.

While implementing the performance standards, the state regularly consulted with WIBs to gain their support and to ensure consistency in performance measurement. For example, when the policy was first rolled out, there was confusion among training providers and WIBs about which entity would be responsible for collecting data; each thought this task would be the other’s responsibility. To clarify this and other issues that arose, the state instituted a monthly teleconference with WIBs that facilitated information sharing and consistency in the adoption of the performance standards.

The experience of State B suggests that implementing subsequent eligibility requirements in a waiver state takes considerable planning, coordination, and resources. State B has more dedicated state-level ETPL management staff than does State A, the other waiver state included in our discussions. While State B has two full time staff dedicated to ETPL administration, State A has only one person who spends only half of her time managing the ETPL. This may be a factor in why State B was able to begin implementing performance standards while State A has not.

12.2.3 Subsequent Eligibility

Among the three states with which we spoke, only State C does not currently have a waiver and, therefore, must comply with subsequent eligibility procedures. In this state, training providers annually submit self-reported performance data and documentation about program performance for each ETP program. In order to qualify for subsequent eligibility, programs must meet two of the three the performance standards required for all students listed in Exhibit 53. They must also meet three of the four performance standards specific to WIA students. Programs that do not meet local area thresholds on these indicators are removed from the ETPL.

Exhibit 53. Performance Standards in State C

Performance Indicator	Threshold Value
Number and percentage of all individuals completing the program	Varies
Number and percentage of all completers who obtained unsubsidized employment	75.6%
Average weekly earnings at placement (for completers and non-completers combined)	\$480
Percentage who completed the applicable program and were placed in unsubsidized employment	75.6%
Retention rates in unsubsidized employment at six months for WIA participants	84.4%
Average weekly earnings at six months for WIA participants	\$480
Rates of licensure or certification, degree attainment of academic degrees of equivalents, or attainment of other measures of skills of the graduates of the applicable program for WIA participants	60%

As with State B, State C implemented performance standards relatively recently. Its waiver was removed only a year and a half ago. Therefore, lessons from the application of performance measures can be instructive as WIOA is implemented and ETP programs in current waiver states are required to undergo subsequent eligibility reviews.

One of the key challenges that State C faced as it made the transition to implementing subsequent eligibility requirements was the lack of database infrastructure. WIBs were required to collect subsequent eligibility information from providers before a database system that could effectively capture and transfer these data was available. This required that WIBs send out emails to all training providers and set up an FTP site to which each provider could upload performance information. Many of these providers did not supply the Social Security numbers for participants, making it difficult to complement the self-reported data with UI data for verification. State C currently is implementing a new database system that will enable users to pull Social Security numbers for WIA participants and link that information to training programs so that program performance can be assessed more efficiently.

In State C, the annual subsequent eligibility requirements and processes are reinforced through extensive state-defined, locally-administered monthly and quarterly reporting and monitoring activities. Training providers submit monthly reports to local area “Career Advisors” on the status of provider completion rates, credential rates, employment rates, and average wage at placement. This information then is reviewed quarterly through a review of submitted monthly reports, and, at times, onsite monitoring visits. This process helps to ensure that providers are meeting performance standards. If their quarterly performance outcomes are not adequate, providers will be placed in a “hold” status by the WIB, and caseworkers will not be allowed to assign ITAs to that trainer until they provide documentation that any issues that may be leading to poor performance are addressed. Results of quarterly performance reviews and provider “hold” status indications are posted on local WIB websites.

12.3 Challenges in ETPL Administration

Throughout our discussions, the challenge related to ETPL administration that the state and local ETPL coordinators mentioned most frequently was collecting reliable and complete data about training program performance. This mirrors the findings of the ETPL Coordinator Survey.³⁶ In our discussions, ETPL Coordinators and training providers identified the following factors that influenced state and WIB efforts to collect this program performance information:

- Resource constraints of ETPs, especially community colleges, in supplying performance information
- Resistance to uniform performance standards throughout the state
- Concerns that collecting and using performance data will limit the number of programs on the ETPL
- Limited access to administrative data

12.3.1 Provider Resources for Collecting Performance Information

Among the state and local ETPL coordinators with whom we spoke who measured program performance, most relied to some extent on self-reported data from training providers. This presented a number of challenges. First, generally, this information is easier to obtain from private training providers than from those affiliated with public institutions. Often, private providers already have outreach staff committed to collecting the programs’ performance data because they are required to maintain accreditation with state boards for secondary education. When private providers’ outreach staff collect these data they could include additional performance measures in their follow-up calls with former students to accommodate ETP requirements. Additionally private providers often have direct relationships with employers in the area that can be used to ascertain former students’ placement and employment status. Because they tend to be smaller, private providers also may be more dependent on ITAs than are public institutions. This provides additional incentives for them to provide WIBs with the data required to measure performance. We also noted that private providers use performance

³⁶ Collecting quality data about ETP program performance was the challenge that respondents most frequently rated as difficult or very difficult in the survey (see Exhibit 27).

measures to shape marketing and outreach materials for potential students and employer partners. Any additional data that these providers capture for ETPL participation could support existing promotional activities.

Some state and local ETPL coordinators stressed that it is especially difficult to collect program performance data from public community colleges because of the colleges' resource constraints. Community colleges, typically, are bound by regional accreditation boards and do not need to collect performance data for licensing or other reporting; they would require additional support to do so. Community college providers and local ETPL coordinators noted that they likely will not be able to provide complete performance data without additional funding and infrastructure, because they do not already have systems in place to collect these data and do not have enough demand from ITA customers to permit new investments in additional staff and technology to collect data. In some cases, community colleges would be able to collect these data only if states provide funds to support staff to follow-up with students after they complete a course. This is because some colleges remove students from the school's databases and tracking systems after they have left the institution.

While Institutional Research divisions at community colleges have some statistics on students, generally they do not capture the level of detail on all students that is required for inclusion on the ETPL. In addition to the Institutional Research group, some schools with whom we spoke have Internal Affairs groups that calculate the aggregate course completion outcomes that they are required to report to the Department of Education for training and funding purposes. These data, however, rarely match the information needed by the workforce system. One training provider at a community college noted that they "are barely getting their student administration and registration information going" and would have great difficulty collecting additional information on performance. Public training providers agreed that they already are overburdened with existing reporting and cannot imagine having to do more reporting on the programs without more staff resources.

These concerns are reflected in State B's transition to collecting performance information from ETPLs. A provider mentioned that they already are taxed with maintaining the detailed program documentation, which is updated annually, and collecting additional performance data would have to be simple and integrated into current processes to be successful. The provider also noted that they might not have the staffing resources necessary to meet the new performance reporting requirements. To address this need, the state is considering introducing trainings for providers related to collecting performance data.

There are also concerns among some local ETPL coordinators in State B that this process will have a substantial effect on the providers included on the list. Of particular concern is that community colleges, which are the largest training providers, do not have sufficient staff resources to collect data, or that they will not meet performance standards (one community college provider mentioned that across their programs only 20 percent of all participants complete their training programs) and will be removed from the ETPL. This could substantially limit the training options available to ITA customers.

12.3.2 Uniform Performance Standards

We spoke with state and local ETPL coordinators who suggested that it would be beneficial for states to adopt rigorous and consistent performance requirements to determine program eligibility, rather than allow variation across WIBs. However, other local ETPL coordinators were less supportive of this approach. There was particular concern that high uniform performance standards would result in a list of ETP providers that does not reflect variation in training needs throughout the state. While these more rigorous performance criteria might be useful in some areas, if stringent criteria are used to remove providers from the list, they may result in limiting the training options that are available in other areas. For example, in rural areas, in which there are fewer jobs available, ETPL coordinators were concerned that statewide performance standards for eligibility would make it more difficult for training providers to qualify to be on the ETPL. Because of the limited number of providers in these areas, removing any from the lists would have substantial effects on where individuals are able to use their ITAs. In another example, WIBs found it effective to adjust performance requirements to address variation in the cost of living throughout the state. While the state set minimum performance standards for wages, WIBs in urban areas raised them to reflect the higher cost of living. It was mentioned at both the state and local level that these types of variations can be important in ensuring that the list reflects the diversity of training needs across the state.

Additionally, some WIBs mentioned that performance indicators that are set for the whole labor market may be inappropriate for some industries. For example, providers that serve industries with high turnover rates might perform poorly on performance indicators that track longer-term employment. Local ETPL coordinators and training providers suggested that because the performance standards do not reflect the realities of the industry, these programs might be removed from the list even though they provide a service to the industry and successfully address industry needs.

12.3.3 Performance Standards and Trainee Choice

Local and state-level ETPL coordinators expressed concern that instituting performance standards, particularly in relation to community colleges, would limit the training options available to ITA customers. Local ETPL coordinators mentioned that community colleges do not currently collect employment data on all participants and some may choose not to list programs on the ETPL if doing so would require reporting additional performance data. Local ETPL coordinators, especially those in rural areas, noted that losing community colleges from the ETPL “would really destroy our system” because the community college is the only local training provider. While local ETPL coordinators noted strong institutional relationships with their community colleges, they did not believe that they had the clout to keep them on the ETPL and were “not sure that the workforce system is powerful enough” to provide enough business to motivate them to collect more data to support the program.

Individuals with whom we spoke proposed various solutions to this issue, including providing colleges with reports on the data that are collected for the ETPL. This information could be used by community colleges to market their programs to broader audiences (not just WIA

participants). Another resolution may be to find ways to use existing outcome data (i.e., from follow-up used to support Department of Education grants and financial aid funding) to extract workforce-relevant performance measures. For example, under State B's new subsequent eligibility policy, post-secondary institutions that are eligible for federal funding under Title IV of the Higher Education Act may provide specific performance data that are consistent with this act instead of the performance measures specified in the state policy.

Local ETPL coordinators in State A, which is decentralized, noted that they need more support from the state to resolve challenges related to community college performance reporting. The coordinators stated that states, WIBs, and college staff must collaborate actively to identify feasible solutions to these challenges. They also suggested that it could be helpful to institute college bylaws that require them to supply performance information. Local ETPL coordinators in State B also suggested that it would be helpful to organize state higher education agencies to oversee performance reporting among community colleges.

To ensure that performance standards do not substantially restrict the market of eligible providers, State C has required programs to meet only two of the three subsequent eligibility criteria for all participants and three of the four requirements for WIA participants. In this way, providers can collect the data that are most relevant and accessible within their institution. The state implemented this policy when it recognized that it was not feasible for some providers to report data on all subsequent eligibility indicators. This approach could encourage community colleges to remain on the ETPL and continue to supply performance data. State C also has established a relationship with the state's public technical college program, which has very high program standards. At the state's discretion, programs from public technical colleges are eligible for the ETPL, regardless of whether they meet performance criteria because they are vetted by the state's technical college system. At subsequent eligibility reviews, the state reviews the programs' performance and decides whether a program can remain on the list if its performance is below standards. This relationship helps to ensure the presence of community colleges on the ETPL.

12.3.4 Access to Administrative Data

Individuals with whom we spoke recognized that administrative data offered a more reliable source of information to measure performance than did self-reported data from training providers. The state and local ETPL coordinators we contacted use these administrative data in various ways. For example, one state uses them to verify a number of self-reported annual performance metrics supplied by training providers and to disseminate quarterly performance reports on each provider on the ETPL to the public. They are able to access these data based on a data sharing agreement with the state and WIBs.

While these administrative data are valuable for verifying and reporting program performance, a number of individuals noted that they can be difficult to access. This is especially true in State A, which does not mandate the collection of performance information. In State A, some WIBs use UI wage data to track performance indicators. However, these data are not available to all WIBs. Often, data are available only if a WIB pays a fee each time it accesses the data. Yet, even when

the WIB pays the fees, the state does not always provide access to all of the information commonly available in UI wage data. Training providers also noted that they encountered difficulties entering into memoranda of understanding (MOUs) with the state to gain access to UI data because of the state's concerns with confidentiality.

States B and C, which require the collection of performance information, provide the infrastructure and data access that support matching individuals with UI wage data. In this sense, the required collection of program performance information is related to greater support for accessing higher quality data sources. This may explain our finding from the ETPL Coordinator Survey that states with more rigorous ETPL standards and practices were less likely to rate collecting reliable data about program performance as difficult.

12.4 Implications of Follow-Up Discussions

In our follow-up discussions with state and local ETPL coordinators and training providers, we learned key information that will be informative to DOL as it proceeds with WIOA implementation and ends the use of waivers.

Throughout our discussions, the individuals with whom we spoke frequently mentioned challenges associated with collecting program performance information. Private training providers have more resources to collect and report this information compared to public institutions. The fact that private providers tend to rely on ITAs to a greater extent also means that they are more motivated to collect performance information. Public providers, particularly community colleges, are less likely to have the resources to track performance. These training providers felt that if DOL does not include additional funding and support in the implementation of ETP program performance standards, they will be unable to meet the requirements. WIBs in more rural areas will be most affected if community colleges are disqualified from the ETPLs, since these institutions often are the only training providers available to local ITA customers.

Given these circumstances, training providers and some local ETPL coordinators said that they would like to see additional guidance on how they should collect performance data. They mentioned that providers are anxious about the new requirements and do not like "not knowing where they are headed." Success, they say, will be contingent on how the measures are rolled out.

The experiences of States B and C could be instructive as DOL begins to implement WIOA requirements. These states recently made the transition from not requiring performance standards to implementing them statewide. Their experiences suggest that frequent communication with WIBs is important to ensure that the standards are implemented consistently and that the transition receives maximum support. Additionally, to streamline the process and improve the efficiency of data collection, the state should implement the appropriate database structures before WIBs and training providers are required to submit performance data.

It was clear across these interviews that access to administrative data remains an issue. WIBs' and training providers' abilities to access UI wage data varied substantially even within the same state. The variation in access poses an impediment to state and WIB efforts to successfully track and validate ETP program performance information and may limit the reliability of the program performance information collected under WIOA.

13. SUMMARY AND CONCLUSIONS

ETPLs are intended to improve employment outcomes by enabling WIA training customers to select approved training programs that meet their career goals and needs. To that end, WIA emphasizes the importance of maximizing consumer choice in training programs while also ensuring that customers use ITAs for high-quality programs likely to result in successful employment outcomes. Understanding if and how states' ETPL policies and practices reflect these goals first requires a comprehensive understanding of ETPL procedures. It also requires an understanding of the challenges that states face in implementing ETPLs. The results of our national survey of state ETPL coordinators provide a comprehensive and current documentation of these issues. Specifically, data from the survey provide insight into:

- How ETPLs are managed and administered across the U.S.;
- How states collect, use, and report ETP program information;
- What challenges states face in conducting ETPL tasks.

Additionally, the findings from our follow-up discussions provide context for the survey findings.

This study provides a foundation for further research into ETPL procedures and can inform DOL's efforts to improve ETPL policies and practices throughout the U.S. This report also serves as a reference for understanding how states administer their ETPLs and the particular policies and practices they adopt. This knowledge will be particularly useful in light of WIOA. This report also provides information about the number of states that might be affected by specific policy changes and how many states already perform the tasks associated with the new legislation.

13.1 Managing and Administering ETPLs

Many states that responded to the survey indicated that they maintain primary responsibility for tasks related to ETPL administration. In about half of responding states, the state agency sets the program eligibility criteria, updates the ETPL, and reports program performance, without input from WIBs. More than half of responding states are characterized as completely or primarily centralized when it comes to performing key ETPL tasks. These centralized states tend to be more rigorous in their ETPL standards and practices and have a higher quality of ETP program reporting.

Although the ETPL is intended to maximize trainee choice in training programs, it limits eligible programs to those that are likely to result in successful employment outcomes for trainees. One of the mechanisms for achieving this goal is requiring that ETP programs address high-demand, high-wage occupations. More than one quarter of responding states do not require ETP programs to address high-demand occupations, however. Most responding states that have this requirement also have mechanisms to provide exemptions. For example, in our follow-up discussions, we noted that in State C, programs that may no longer be in-demand in a local area may be removed from the local area's list but maintain eligibility on the state list. This practice was implemented to ensure that a provider that makes the effort to develop a good training

program will not be punished for being successful in saturating a local area with eligible employees.

13.2 Collecting, Using, and Reporting ETP Program Information

WIA's goals of ensuring the quality of ETP programs and disseminating program information to training customers depend on the rigorous collection, use, and reporting of program data.

13.2.1 Collecting Program Performance Information

States that responded to the ETPL Coordinator Survey indicated that they use a variety of data sources to gather ETP program information, including:

- Self-reported data from training providers
- Student records
- UI wage records

In collecting program information for initial eligibility as well as after initial eligibility, responding states frequently rely on self-reported data from training providers. When used to measure program performance, these data may be inaccurate, as they reflect the training providers' tendency to report data in ways that reviewers will perceive as favorable. Student records and UI wage data likely are more reliable; however, as evidenced in the follow-up discussions, these data can be difficult to obtain. Efforts to encourage greater use of data from these sources and improve access to them at both initial eligibility reviews and any following reviews likely will increase the reliability of ETP program performance information.

13.2.2 Using Program Performance Information

The program performance information that states are collecting and the ways in which they are using this information varies among the states that responded to the survey, largely based on whether or not they have an initial eligibility waiver. Non-waiver states are more likely to use program performance information to make determinations about initial eligibility than are waiver states. Because of subsequent eligibility requirements, non-waiver states also use performance information to decide whether programs remain eligible to be included on the ETPL after the period of initial eligibility.

Some responding waiver states do not use performance information to determine initial eligibility and do not collect this information at any later point. Thus, some states do not consider performance information in determining which programs are eligible to be included on the ETPL. In these states, training customers may be selecting from lower-quality programs and potentially seeing fewer successful employment outcomes.

A number of responding waiver states (including State B in the follow-up discussion) continue to collect program performance information after initial eligibility, even though the waiver exempts them from this requirement. Among these states, many are measuring WIA subsequent eligibility criteria, and almost half remove programs from the ETPL that fail to meet performance

standards. These states essentially follow subsequent eligibility procedures even though they are not required to do so. In conversations, the ETPL coordinators in State B expressed that their motivations for implementing these procedures arose from their desire to ensure the quality of programs on the ETPL and prepare for federal reporting requirements associated with WIOA.

13.2.3 Completeness of Reported Program Performance Information

The ability of training customers to make informed decisions about how to use their ITAs relies on their access to up-to-date and complete program information. A key piece of their decision-making process is access to complete program performance information. Slightly more than half of states that responded to the survey make performance information about ETP programs publicly available. Among these states, many of the data are not complete across programs. Increasing customer access to this information may enable them to make more empowered and better decisions.

Improved reporting relies not only on states and WIBs making performance information publicly available but also on their rigorous collection and maintenance of program information. States that have higher-quality performance reporting tend to follow rigorous approaches to ETPL standards and practices. Therefore, states that have lower-quality performance reporting may have to increase the rigor of ETPL standards and practices to improve the quality of reporting.

13.3 Challenges Associated with ETPL Tasks

The challenges that states face in conducting particular ETPL tasks likely both shape and are shaped by ETP policies and practices. Therefore, it is important to examine potential links between the two. Generally, responding states that follow WIA subsequent eligibility procedures do not experience greater challenges in related ETPL tasks than do states with waivers. In fact, non-waiver states often rated ETPL tasks to be easier than did waiver states. Our follow-up discussions suggest that this may result from the fact that when the state requires the collection of performance information, it is more likely to provide access to the data and infrastructure necessary to gather this information.

As we mentioned earlier, previous studies suggested that strengthening ETP reporting requirements could present challenges in getting enough qualified providers on the list.³⁷ However, the findings of the survey suggest that responding waiver states, which do not require ongoing reporting for subsequent eligibility, have found it more difficult to get enough qualified providers on the list than have non-waiver states. However, the potential for public institutions such as community colleges not to apply to be eligible on account of performance requirements was mentioned throughout our follow-up discussions. Additionally, according to survey data, waiver states reported greater difficulty in gathering quality data about program performance than did non-waiver states. Similarly, states with higher-quality program performance reporting were no more likely than other states to rate data collection and reporting tasks as difficult.

³⁷ D'Amico, 2001, *op. cit.*

13.4 ETPLs and Scorecards

The findings from the ETPL coordinator survey also have implications for states and the federal government as they pursue efforts to create training program scorecards, especially for institutions of higher education and for ETP programs as part of WIOA. Scorecards often provide similar information to the performance and cost information on the ETPLs but use state administrative data to provide information across all programs, not just those that have been vetted. As the findings from this report clearly show, states determine the appropriateness of training providers and the quality of their programs for the ETPL in a variety of ways that could inform scorecard efforts. These ETPL processes might not be easily translated into creating scorecards, which often use centralized and systematic data and criteria across all programs. States that have more rigorous processes to make ETPL determinations use administrative data sources and provide a richer, more consistent set of information to help WIA training participants make decisions. These states, which already may have developed or are developing scorecard efforts, may be better positioned than others to implement training program scorecards.

APPENDIX A: STATES WITH INITIAL ELIGIBILITY WAIVERS

As of May 2014, the following 39 states have waivers from initial eligibility: Alaska, Alabama, Arkansas, Arizona, California, Colorado, Connecticut, District of Columbia, Hawaii, Iowa, Idaho, Kansas, Kentucky, Louisiana, Maryland, Maine, Michigan, Minnesota, Montana, North Carolina, North Dakota, Nebraska, New Hampshire, New Jersey, New Mexico, New York, Ohio, Oklahoma, Oregon, Puerto Rico, Rhode Island, South Carolina, Texas, Utah, Virginia, Vermont, Wisconsin, West Virginia, and Wyoming.

APPENDIX B: SURVEY INSTRUMENT



ETPL COORDINATOR SURVEY

The OMB Control Number for this information collection is 1205-0436 and the expiration date is 1/31/2017. According to the Paperwork Reduction Act of 1995, persons are not required to respond to this collection of information unless it displays a currently valid OMB control number and expiration date. Responding to this survey is voluntary. Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information to Richard Muller at muller.richard@dol.gov.

Thank you for taking the time to complete this brief survey. The U.S. Department of Labor is working to develop a better understanding of how the Eligible Training Provider List (ETPL) in each state is produced, administered, and used. We're hoping that you can provide some insight into how these processes work in your state. The information you provide will be used in combination with what we learn from others to produce an overview of ETPL administration processes. The staff member responsible for coordinating the ETPL is the intended – and best – respondent for the survey. However, coordinators are **encouraged to consult, as needed, with other staff members or supervisors** and refer to ETPL records when responding to survey items requiring additional details or input. If there is a question you cannot answer exactly, please provide your best estimate.

OVERVIEW

First, we have a few questions about how the Eligible Training Provider List (ETPL) is administered in your state. The ETPL is the list of all training programs in a state that are eligible to receive individual training account (ITA) funds as part of the Workforce Investment Act (WIA). The exact name for this list may vary across states.

Q1. In which state are you located?

[PROGRAMMER NOTE: Present as a drop-down list; Select only one]

<i>Alabama</i>	<i>01</i>	<i>Hawaii</i>	<i>12</i>	<i>Michigan</i>	<i>23</i>
<i>Alaska</i>	<i>02</i>	<i>Idaho</i>	<i>13</i>	<i>Minnesota</i>	<i>24</i>
<i>Arizona</i>	<i>03</i>	<i>Illinois</i>	<i>14</i>	<i>Mississippi</i>	<i>25</i>
<i>Arkansas</i>	<i>04</i>	<i>Indiana</i>	<i>15</i>	<i>Missouri</i>	<i>26</i>
<i>California</i>	<i>05</i>	<i>Iowa</i>	<i>16</i>	<i>Montana</i>	<i>27</i>
<i>Colorado</i>	<i>06</i>	<i>Kansas</i>	<i>17</i>	<i>Nebraska</i>	<i>28</i>
<i>Connecticut</i>	<i>07</i>	<i>Kentucky</i>	<i>18</i>	<i>Nevada</i>	<i>29</i>
<i>Delaware</i>	<i>08</i>	<i>Louisiana</i>	<i>19</i>	<i>New Hampshire</i>	<i>30</i>
<i>District of Columbia</i>	<i>09</i>	<i>Maine</i>	<i>20</i>	<i>New Jersey</i>	<i>31</i>
<i>Florida</i>	<i>10</i>	<i>Maryland</i>	<i>21</i>	<i>New Mexico</i>	<i>32</i>
<i>Georgia</i>	<i>11</i>	<i>Massachusetts</i>	<i>22</i>	<i>New York</i>	<i>33</i>

<i>North Carolina</i>	34	<i>Rhode Island</i>	41	<i>Virginia</i>	48
<i>North Dakota</i>	35	<i>South Carolina</i>	42	<i>Washington</i>	49
<i>Ohio</i>	36	<i>South Dakota</i>	43	<i>West Virginia</i>	50
<i>Oklahoma</i>	37	<i>Tennessee</i>	44	<i>Wisconsin</i>	51
<i>Oregon</i>	38	<i>Texas</i>	45	<i>Wyoming</i>	52
<i>Pennsylvania</i>	39	<i>Utah</i>	46		
<i>Puerto Rico</i>	40	<i>Vermont</i>	47		

GO TO Q2.

Q2. What is the name of your organization?

GO TO Q3

Q3. What is your position within this organization?

GO TO Q4a

Q4a. Please indicate whether each of the following tasks of managing the ETPL is conducted at the state level and/or WIB level. (Check all that apply)

TASK	CONDUCTED AT STATE LEVEL	CONDUCTED AT WIB LEVEL
Setting program eligibility criteria	<input type="checkbox"/>	<input type="checkbox"/>
Verifying that programs are eligible to be included on the ETPL	<input type="checkbox"/>	<input type="checkbox"/>
Updating the ETPL	<input type="checkbox"/>	<input type="checkbox"/>
Reporting program performance	<input type="checkbox"/>	<input type="checkbox"/>

GO TO Q4b.

Q4b. Are there any other important tasks related to managing the ETPL that are conducted at the state level?

- Yes (please specify) _____
- No

01 } **GO TO**
02 } **Q4c**

- Blank/Refused

99 → Q4c

Q4c. Are there any other important tasks related to managing the ETPL that are conducted at the WIB level?

- Yes (please specify) _____
- No

01 } **GO TO Q5**
02 }

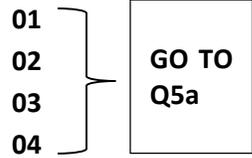
- Blank/Refused

99 → Q5

Q5. In [state/territory], what is the minimum state-wide requirement for how frequently the ETPL is updated?

- At least once a month 01
- Every few months 02
- Once a year 03
- Less frequently than once a year 04
- There is no minimum state-wide requirement 05 → Q5b
- Other (please specify) _____ 06 → Q5b

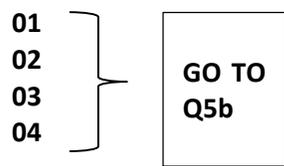
- Blank/Refused 99 → Q5b



Q5a. What portion of WIBs updates the ETPL more frequently than the minimum state-wide requirement?

- All WIBs 01
- Most WIBs 02
- Some WIBs 03
- No WIBs 04

- Blank/Refused 99 → Q5b

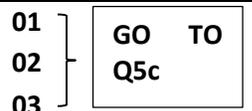


Q5b. Are non-compliant training programs removed from the ETPL during the updating process?

[Programmer Note: This would be a check all that apply but respondent cannot check option 3 if either 1 or 2 are checked].

- Yes, this occurs at the state level 01
- Yes, this occurs at the WIB level 02
- No, this does not occur at either the state or WIB level 03

- Blank/Refused 99 → Q5c



Q5c. In order to be included on the ETPL in [state/territory], is it required that training programs address high demand occupations?

[Programmer Note: This would be a check all that apply but respondent cannot check option 3 if either 1 or 2 are checked].

- Yes, this is required at the state level 01
- Yes, this is required at the WIB level 02
- No, this is not required at either the state or WIB level 03 → GO TO Q5f

- Blank/Refused 99 → Q5f



Q5d. In [state/territory], how is it determined which occupations are considered high demand? (Check all that apply)

- A list of high demand occupations is developed by the state 01
 - Local WIBs develop lists of high demand occupations 02
 - There is no formal list, staff rely on their knowledge of the local economy 03
 - Other (please specify) _____ 04
- | |
|--------------|
| GO TO
Q5e |
|--------------|
- Blank/Refused 99 → Q5e

Q5e. Can exceptions be made for including programs on the ETPL that do not address high demand occupations?

[Programmer Note: This would be a check all that apply but respondent cannot check option 3 if either 1 or 2 are checked].

- Yes, the state allows for these exceptions 01
 - Yes, WIBs allow for these exceptions 02
 - No, neither the state nor the WIBs allows for these exceptions 03
- | |
|--------------|
| GO TO
Q5f |
|--------------|
- Blank/Refused 99 → Q5f

Q5f. Does the ETPL in [state/territory] include training programs that are taught exclusively online?

- Yes 01
 - No 02
- | |
|-----------|
| GO TO Q5g |
|-----------|

- Blank/Refused 99 → Q5g

Q5g. If a training program is approved to be included on another state's ETPL, which of the following processes are followed at the state and/or WIB level to include that program on [state/territory]'s ETPL? (Check all that apply)

- Out-of-state training programs are not permitted to be included on [state/territory]'s ETPL 01
- An out-of-state program would go through the same approval process as in-state programs, regardless of whether or not it is already included on another state's ETPL 02
- There is an abbreviated approval process for adding individual programs that are already included on another state's ETPL 03
- There is a formal agreement in place where programs on certain states' ETPLs are automatically eligible for inclusion on [state/territory]'s ETPL (also known as a reciprocal agreement) 04
- Other (please specify) 05
- Blank/Refused 99

If 04 is selected go to Q5h. Otherwise go to Q6.

Q5h. You noted that programs from certain states are automatically eligible for inclusion on [state/territory]’s ETPL (also known as a reciprocal agreement). With which states are there reciprocal agreements? (Check all that apply)

<i>Alabama</i>	<i>01</i>	<i>Louisiana</i>	<i>19</i>	<i>Oklahoma</i>	<i>37</i>
<i>Alaska</i>	<i>02</i>	<i>Maine</i>	<i>20</i>	<i>Oregon</i>	<i>38</i>
<i>Arizona</i>	<i>03</i>	<i>Maryland</i>	<i>21</i>	<i>Pennsylvania</i>	<i>39</i>
<i>Arkansas</i>	<i>04</i>	<i>Massachusetts</i>	<i>22</i>	<i>Puerto Rico</i>	<i>40</i>
<i>California</i>	<i>05</i>	<i>Michigan</i>	<i>23</i>	<i>Rhode Island</i>	<i>41</i>
<i>Colorado</i>	<i>06</i>	<i>Minnesota</i>	<i>24</i>	<i>South Carolina</i>	<i>42</i>
<i>Connecticut</i>	<i>07</i>	<i>Mississippi</i>	<i>25</i>	<i>South Dakota</i>	<i>43</i>
<i>Delaware</i>	<i>08</i>	<i>Missouri</i>	<i>26</i>	<i>Tennessee</i>	<i>44</i>
<i>District of Columbia</i>	<i>09</i>	<i>Montana</i>	<i>27</i>	<i>Texas</i>	<i>45</i>
<i>Florida</i>	<i>10</i>	<i>Nebraska</i>	<i>28</i>	<i>Utah</i>	<i>46</i>
<i>Georgia</i>	<i>11</i>	<i>Nevada</i>	<i>29</i>	<i>Vermont</i>	<i>47</i>
<i>Hawaii</i>	<i>12</i>	<i>New Hampshire</i>	<i>30</i>	<i>Virginia</i>	<i>48</i>
<i>Idaho</i>	<i>13</i>	<i>New Jersey</i>	<i>31</i>	<i>Washington</i>	<i>49</i>
<i>Illinois</i>	<i>14</i>	<i>New Mexico</i>	<i>32</i>	<i>West Virginia</i>	<i>50</i>
<i>Indiana</i>	<i>15</i>	<i>New York</i>	<i>33</i>	<i>Wisconsin</i>	<i>51</i>
<i>Iowa</i>	<i>16</i>	<i>North Carolina</i>	<i>34</i>	<i>Wyoming</i>	<i>52</i>
<i>Kansas</i>	<i>17</i>	<i>North Dakota</i>	<i>35</i>		
<i>Kentucky</i>	<i>18</i>	<i>Ohio</i>	<i>36</i>		

GO TO Q6.

DETERMINING TRAINING PROGRAM INITIAL ELIGIBILITY

Now we’d like to ask you about the criteria that are used to identify training programs that are initially eligible for inclusion on [state/territory]’s ETPL. If there is a question you cannot answer exactly, please provide your best estimate.

Q6. Which of the following items are among the *state-wide* criteria for determining whether a program is *initially eligible* for inclusion on [state/territory]’s ETPL? (This would not apply to programs that are automatically eligible to be included on the ETPL.) (Check all that apply)

- Length of time program has been in existence 01
- Program performance outcomes 02
- Program cost 03
- Program provider licensing/accreditation 04
- Qualifications of training staff 05
- Degree or credential training customers will receive upon program completion 06
- Program addresses a high growth industry 07
- Program addresses an in-demand occupation 08
- Other (please specify)_____ 09

**GO TO
Q7**

- Blank/Refused

99→Q7

Q7. In [state/territory], have local WIBs set initial eligibility criteria that are more rigorous than the state-wide criteria?

- Yes, all local WIBs have more rigorous criteria
- Yes, most local WIBs have more rigorous criteria
- Yes, some local WIBs have more rigorous criteria
- No, local WIBs do not have more rigorous criteria

01 }
02 } **GO TO**
03 } **Q8**
04 }

Blank/Refused

99 → Q8

Q8. Within [state/territory], which of the following data sources are used to measure whether providers meet initial eligibility criteria? (Check all that apply)

- Self-reported data from training providers
- Student records (e.g. program completion, courses completed, etc.)
- Unemployment Insurance wage records
- Other (please specify) _____

01 }
02 } **SEE**
03 } **BELOW**
04 }

Blank/Refused

99

If state has a waiver (identifier in sample file), GO TO Q9, ELSE GO TO Q14a.

WAIVER

We'd like to ask you about the waiver [state/territory] has in place that extends the time limit on the period of initial eligibility for training programs and releases programs from subsequent eligibility requirements. If there is a question you cannot answer exactly, please provide your best estimate.

Q9. For which of the following reasons did [state/territory] request this waiver extending the period of initial eligibility? (Check all that apply)

- Maximizing trainee choice in training programs
- Reducing reporting burden for training providers
- Limitations of sources of program performance information
- Other (please specify) _____

01 }
02 } **GO TO**
03 } **Q10**
04 }

Blank/Refused

99 → Q10

Q10. To which training programs does this waiver apply? (Check all that apply)

- All programs on the ETPL
- Apprenticeship programs
- Two-year community college and technical college programs
- Four-year college/university programs
- On-the-job training programs
- Private, for-profit training provider programs
- Programs run by community-based organizations
- Union programs
- Other (please specify) _____

01 }
02 }
03 }
04 }
05 } GO TO
06 } Q10a
07 }
08 }
09 }

Blank/Refused

99→Q10a

Q10a. Although there is a waiver in place, does the state or do any local WIBs still require the collection of updated cost/tuition information from programs after they have been approved for initial eligibility?

- Yes, it is required by the state
- Yes, it is required by *all* local WIBs
- Yes, it is required by *some* local WIBs
- No, it is not required by the state or by local WIBs

01→Q10b
02→Q10b
03→Q10b
04→Q11

Blank/Refused

99→Q11

Q10b. Within [state/territory], would failure to keep program cost/tuition below a certain level influence the decision to remove a program from the ETPL?

- Yes
- No
- It varies by WIB

01
02
03

Blank/Refused

99

GO TO Q11

Q11. Although there is a waiver in place, does [state/territory] or do any local WIBs still require the collection of performance outcome information for training programs after they have been approved for initial eligibility?

- Yes, it is required by the state
- Yes, it is required by *all* local WIBs
- Yes, it is required by *some* local WIBs
- No, it is not required by the state or by local WIBs

01 }
02 } GO TO Q12
03 }
04→Q21a

Blank/Refused

99→Q21a

Q12. Does the state determine what performance outcome information is collected or do local WIBs?

- The state alone determines what performance information is collected
- The state sets minimum standards about what performance information is collected but WIBs can collect additional information
- Local WIBs alone determine what performance information is collected

01
02
03

GO TO
Q13

- Blank/Refused

99 → Q13

Now we'd like to ask you about the program performance information that is collected after initial eligibility and how program performance is measured. If there is a question you cannot answer exactly, please provide your best estimate.

Q13. In [state/territory], for which of the following types of programs is performance outcome information collected after initial eligibility? (Check all that apply)

- All programs on the ETPL
- Apprenticeship programs
- Two-year community college and technical college programs
- Four-year college/university programs
- On-the-job training programs
- Private, for-profit training provider programs
- Programs run by community-based organizations
- Union programs
- Other (please specify) _____

01
02
03
04
05
06
07
08
09

GO TO
Q13a

- Blank/Refused

99 → Q13a

Q13a. For those programs where performance outcome information is collected, which of the following program performance indicators are measured after initial eligibility? (Check all that apply)

	Performance Indicator						
	Program Completion Rate	Percent of Participants who have Obtained Unsubsidized Employment	Rate of Retention in Employment at Six Months	Wages at Placement	Wages at Six Months	Rate of Licensure, Certification, Attainment of Degrees, or Attainment of Other Industry Recognized Credentials	Other (please Specify)
Measured for all Program Participants	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Measured for WIA Participants	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
We do not collect information for this performance measure	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Blank/Refused

99→ 13b

GO TO 13b

Q13b. Within [state/territory] do you remove programs from the ETPL that fail to meet required performance levels on these indicators?

- Yes 01 → Q13c
- No 02 → Q13h
- It varies by WIB 03 → Q13c

- Blank/Refused 99 → Q13h

Q13c. Who sets these minimum performance levels that training programs must meet in order to remain eligible to be included on the ETPL?

- The state 01 → Q13d
- Local WIBs 02 → Q13e

- Blank/Refused 99 → Q13e

Q13d. For those programs that are required to meet performance standards, what are the minimum performance levels on the following indicators for programs to maintain eligibility?

PROGRAMMER NOTE: Only include those items selected in Q13a. IF 13a = 99, LIST ALL		
Performance Indicator	Minimum Performance Level for All Participants	Minimum Performance Level for WIA Participants
Program completion rate	%	%
Percent of participants who have obtained unsubsidized employment	%	%
Rate of retention in employment at six months	%	%
Wages at placement	\$	\$
Wages at six months	\$	\$
Rate of licensure, certification, attainment of degrees, or attainment of other industry recognized credentials	%	%

GO TO Q13e.

Q13e. On average, how frequently are programs that do not meet minimum performance levels reviewed for removal from the ETPL?

- At least once a month
- Every few months
- Once a year
- Less frequently than once a year
- Never
- Other (please specify) _____

01	} GO TO Q13f
02	
03	
04	

05 → Q13h

06 → Q13f

- Blank/Refused

99 → Q13g

Q13f. Is there a probationary period in which these programs are given an opportunity to improve performance without being removed from the ETPL?

- Yes
- No
- It varies by WIB

01	} GO TO Q13g
02	
03	

- Blank/Refused

99 → Q13g

Q13g. If it is determined that a program should be removed from the ETPL, who removes it?

- State agency
- Local WIBs
- Other (please specify) _____

01	} GO TO Q13h
02	
03	

- Blank/Refused

99 → Q13h

Q13h. Which of the following data sources are used to measure training program performance following initial eligibility? (Check all that apply)

- Self-reported data from training providers
- Student records (e.g. program completion, courses completed, etc.)
- Unemployment Insurance wage records
- Other (please specify) _____

01	} GO TO Q13i
02	
03	
04	

- Blank/Refused

99 → Q13i

Q13i. Which factors were the most important in determining which data source(s) to use for measuring program performance? (Check all that apply)

- Availability of the data
- Reducing data reporting burden for training providers
- Legislative limitations on data use (e.g. FERPA, UI wage data regulations)
- Accuracy of the data
- Other (please specify) _____

01	} GO TO Q21a
02	
03	
04	
05	

- Blank/Refused

99 → Q21a

DETERMINING TRAINING PROGRAM SUBSEQUENT ELIGIBILITY

Now we'd like to ask you about the criteria training programs must meet in order to comply with subsequent eligibility requirements. Subsequent eligibility refers to the reassessment of program performance outcomes and other criteria after the period of initial eligibility. This is used to determine if a program remains eligible to be included on the ETPL. If there is a question you cannot answer exactly, please provide your best estimate.

Q14a. Within [state/territory], are training programs required to report updated program cost/tuition information as part of the process of applying for subsequent eligibility?

- Yes 01→Q14b
- No 02→Q14c
- It varies by WIB 03→Q14b

- Blank/Refused 99→Q14c

Q14b. Within [state/territory], would failure to keep program cost/tuition below a certain level influence the decision to remove a program from the ETPL?

- Yes 01→Q14c
- No 02→Q14c
- It varies by WIB 03→Q14c

- Blank/Refused 99→Q14c

Q14c. In [state/territory], which of the following types of programs are required to meet performance standards in order to maintain subsequent eligibility to be included on the ETPL? (Check all that apply)

- All programs on the ETPL 01
 - Apprenticeship programs 02
 - Two-year community college and technical college programs 03
 - Four-year college/university programs 04
 - On-the-job training programs 05
 - Private, for-profit training provider programs 06
 - Programs run by community-based organizations 07
 - Union programs 08
 - Other (please specify) _____ 09
- 01 }
02 }
03 }
04 }
05 }
06 }
07 }
08 }
09 }
GO TO Q14d

- Blank/Refused 99→ Q14d

Q14d. For those programs that are required to meet performance standards to be included on the ETPL, for each of the following criteria, please provide the specific state-wide minimum performance levels necessary for programs to maintain subsequent eligibility.

Criteria	Minimum Performance Level
Minimum completion rate for ALL program participants	%
Minimum unsubsidized employment rate for ALL program participants	%
Minimum wages at placement for ALL program participants	\$
Minimum unsubsidized employment rate for WIA participants who completed the program	%
Minimum rate of retention in employment at six months for WIA participants who completed the program	%
Minimum average wages at six months for WIA participants who completed the program	\$
Minimum rate of licensure, certification, attainment of degrees, or attainment of other industry recognized credentials for WIA participants who completed the program	%

GO TO Q15

Q15. Has [state/territory] set any additional state-wide performance criteria for programs to maintain subsequent eligibility?

- Yes **01→ Q16**
- No **02→Q17**

- Blank/Refused **99→Q17**

Q16. Please list the additional state-wide criteria as well as the minimum performance levels necessary for programs to maintain subsequent eligibility. Please also indicate whether the criteria apply to all program participants, WIA participants only, or non-WIA participants only.

State-wide Criteria	Minimum Performance Level	Applies to all Participants	Applies to WIA Participants
		<input type="checkbox"/>	<input type="checkbox"/>
		<input type="checkbox"/>	<input type="checkbox"/>
		<input type="checkbox"/>	<input type="checkbox"/>
<i>[Include a way to add additional rows if necessary]</i>		<input type="checkbox"/>	<input type="checkbox"/>

GO TO Q17.

Q17. In [state/territory], have local WIBs set subsequent eligibility criteria that are more rigorous than the state-wide criteria?

- Yes, all local WIBs have more rigorous criteria
- Yes, most local WIBs have more rigorous criteria
- Yes, some local WIBs have more rigorous criteria
- No, local WIBs have not done this

01 }
02 } **GO TO**
03 } **Q18**
04 }

Blank/Refused

99 → Q18

Q18. Who collects performance information about training programs for evaluating subsequent eligibility?

- A state agency
- Local WIBs

01 → Q20a

02 → Q19

Blank/Refused

99 → Q20a

Q19. Do all local WIBs use the same data source(s) for measuring training program performance?

- Yes
- No

01 }
02 } **GO TO Q20a**

Blank/Refused

99 → Q20a

Q20a. Which of the following data sources are used to measure training program performance for subsequent eligibility? (Check all that apply)

- Self-reported data from training providers
- Student records (e.g. program completion, courses completed, etc.)
- Unemployment Insurance wage records
- Other (please specify) _____

01 }
02 } **GO TO**
03 } **Q20b**
04 }

Blank/Refused

99 → Q20b

Q20b. Which factors were the most important in determining which data source(s) to use for measuring program performance? (Check all that apply)

- Availability of the data
- Reducing data reporting burden for training providers
- Legislative limitations on data use (e.g. FERPA, UI wage data regulations)
- Accuracy of the data
- Other (please specify) _____

01 }
02 } **GO TO**
03 } **Q21a**
04 }
05 }

Blank/Refused

99 → Q21a

REPORTING TRAINING OUTCOMES

Now we have some questions about the information related to ETPL training programs that is made publicly available to training customers by the state and/or WIBs. If there is a question you cannot answer exactly, please provide your best estimate.

Q21a. Within [state/territory] through which of the following sources are training customers able to access the ETPL? (Check all that apply)

- Online
- American Job Center staff
- Local WIB staff
- Training providers themselves
- Printed publications such as brochures and reports
- Other (please specify) _____

- Blank/Refused

01	} GO TO Q21b
02	
03	
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06	

99→ Q21b

Q21b. Within [state/territory], which of the following pieces of information regarding ETPL training programs are made publicly available by the state and/or WIBs? (Check all that apply)

- Program performance outcomes
- Method of course delivery (e.g. online, classroom)
- Program cost
- Program length
- Availability of support services (e.g. childcare, career counseling)
- Disability adaptation
- Tuition and fees
- Availability of financial aid
- Instructor qualifications
- Other (please specify) _____
- None of the above

01	} IF ANY OF Q21b = 01, GO TO Q22a, ELSE GO TO Q21c
02	
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11	

99→ Q23

Q21c. Are there efforts underway in [state/territory] to begin making training program performance information publicly available?

- Yes
- No

01	} GO TO Q23
02	

- Blank/Refused

99→ Q23

Q22a. Which of the following ETPL program performance information is made publicly available by the state and/or WIBs? (Check all that apply)

Performance Indicator							
Made available in aggregate about...	Program Completion Rate	Percent of Participants who have Obtained Unsubsidized Employment	Rate of Retention in Employment at Six Months	Wages at Placement	Wages at Six Months	Rate of Licensure, Certification, Attainment of Degrees, or Attainment of Other Industry Recognized Credentials	Other (please Specify)
All program participants	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
WIA participants	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
We do not make this information publicly available	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Q22b. Of all programs on [state/territory]'s ETPL, for what portion is performance information reported for each of the following indicators?

PROGRAMMER NOTE: Only populate rows with outcome indicators selected in Q22a, IF Q22a = 99, LIST ALL

	Information reported for all programs	Information reported for more than half but not all programs	Information reported for about half of programs	Information reported for less than half of programs
Program completion rate	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Percent of participants who have obtained unsubsidized employment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rate of retention in employment at six months	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Wages at placement	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Wages at six months	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rate of licensure, certification, attainment of degrees, or attainment of other industry recognized credentials	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

GO TO Q22c.

Q22c. For which ETPL training programs are performance data made publicly available? (Check all that apply)

- All programs on the ETPL
- Apprenticeship programs
- Two-year community college and technical college programs
- Four-year college/university programs
- On-the-job training programs
- Private, for-profit training provider programs
- Programs run by community-based organizations
- Union programs
- Other (please specify) _____

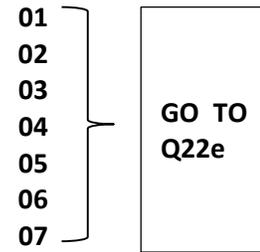
01	GO TO Q22d
02	
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09	

- Blank/Refused

99 → Q22d

Q22d. Through which of the following are training customers able to access *program performance* information? (Check all that apply)

- Online – through the ETPL website
- Online - through a website separate from the ETPL
- American Job Center staff
- Local WIB staff
- Training providers themselves
- Printed publications such as brochures and reports
- Other (please specify) _____



Blank/Refused

99→Q22e

Q22e. Is the training program performance information that is made publicly available, the same information that is used to determine ETPL program eligibility?

- Yes
- No
- It varies by WIB

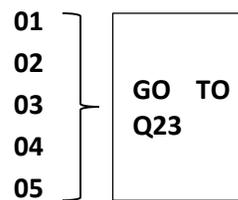


Blank/Refused

99→ Q22f

Q22f. On average, how frequently is reported performance information about each training program updated?

- At least once a month
- Every few months
- Once a year
- Less frequently than once a year
- Never



Blank/Refused

99→ Q23

ETPL CHALLENGES

We'd like to briefly ask you about some potential challenges in administering the ETPL.

Q23. At the state level, please indicate the ease of the following tasks related to *working with ETPL training providers*.

Task	Very Easy	Easy	Difficult	Very Difficult	N/A
Getting new providers onto the ETPL	<input type="checkbox"/>				
Including enough qualified providers on the ETPL	<input type="checkbox"/>				
Communicating ETPL requirements to training providers	<input type="checkbox"/>				
Gathering information about ETPL programs from training providers	<input type="checkbox"/>				
Removing training providers from the ETPL	<input type="checkbox"/>				

GO TO Q24

Q24. At the state level, please indicate the ease of the following tasks related to *maintaining ETPL program information*.

Task	Very Easy	Easy	Difficult	Very Difficult	N/A
Collecting quality data about ETPL program performance	<input type="checkbox"/>				
Ensuring that programs on the ETPL correspond to high-demand occupations	<input type="checkbox"/>				
Ensuring that information about training programs on the ETPL is up-to-date	<input type="checkbox"/>				
Disseminating information about training programs to training customers	<input type="checkbox"/>				

GO TO Q25

Q25. At the state level, please indicate the ease of the following tasks related to *state and local ETPL coordination*.

Task	Very Easy	Easy	Difficult	Very Difficult	N/A
Ensuring local WIB compliance with state-wide ETPL requirements	<input type="checkbox"/>				
Sharing information between local and state offices	<input type="checkbox"/>				

GO TO Q26.

FINALLY, WE'D LIKE TO GIVE YOU AN OPPORTUNITY TO PROVIDE ANY ADDITIONAL INFORMATION THAT YOU THINK MAY BE USEFUL.

Q26. Please share any additional thoughts or comments you have that would enhance our understanding of how ETPL administration and management works in [state/territory].

PROGRAMMER NOTE: Provide text box

GO TO THANK YOU.

THANK YOU FOR TAKING THE TIME TO COMPLETE THIS SURVEY. YOUR ANSWERS WILL BE USED IN COMBINATION WITH OTHERS TO PROVIDE FEEDBACK ON HOW ETPLS ARE ADMINISTERED ACROSS THE UNITED STATES.