MEMORANDUM

FOR: ITA For Credit Providers

FROM: Executive Director, Delaware Workforce Development Board (DWDB)

DATE: June 27, 2107

SUBJECT: Updated Guidance About “For Credit” Courses for Degree Granting Institutions.

References. Federal Register /Vol 81, No. 161/ Friday, August 19 2016, Part VI, Department of Labor, Employment and Training Administration, 20 CFR Parts 603, 651, 652, et al. Workforce Innovation and Opportunity Act (WIOA); Final Rule, section 680.450 (e) 2.

1. Purpose. This memo updates guidance pertaining to Provider Renewal/Initial Submission relative to “For Credit” Courses at Degree Granting Institutions.

2. Problem Statement. It has been brought to our attention over the last several weeks some degree granting institutions, especially those who have open enrollment policies, are finding it difficult to determine credential attainment (i.e. graduation rates) concerning “For Credit” programs. This difficulty makes it impossible for the DWDB to determine initial program eligibility for Individual Training Account (ITA) funding. Moreover, the fluidity of student populations in these institutions may mask a quality program, which can appear substandard, but in fact provides Delaware job seekers excellent potential for unsubsidized employment and wages.

4. Solution. The DWDB will accept “For Credit” programs aligned with Delaware’s Demand Occupation List for ITA funding and will not use graduation rates in its approval criteria. Even so, providers will include graduation rates in their applications and the DWDB will include those rates in the course description to ensure the board meets the consumer choice requirement of WIOA. Be advised the DWDB will vigorously scrutinize the accomplishments of these programs during the 2018 renewal period.

5. Renewal Standards. While the methodology for compiling performance data is being finalized by U.S. DOL and will likely not be in time for next year’s renewal period, it is our intent to stick as closely to the prescribed performance measure in the italics below.

(g) The information requirements that the Governor establishes under paragraph (f)(1) of this section must require eligible training providers to submit appropriate, accurate, and timely information for participants receiving training under WIOA title I, subtitle B. That information must include:

(1) The percentage of program participants who are in unsubsidized employment during the second quarter after exit from the program;
(2) The percentage of program participants who are in unsubsidized employment during the fourth quarter after exit from the program;
(3) The median earnings of program participants who are in unsubsidized employment during the second quarter after exit from the program;
(4) The percentage of program participants who obtain a recognized postsecondary credential, or a secondary school diploma or its recognized equivalent during participation in or within 1 year after exit from the program;
(5) Information on recognized postsecondary credentials received by program participants;
(6) Information on cost of attendance, including costs of tuition and fees, for program participants;
(7) Information on the program completion rate for such participants.

6. Initial eligibility. All prospective providers must submit all information required for initial submissions to be added to the Eligible Training Provider List (ETPL) and qualify for Individual Training Account (ITA) funds. In Accordance With (IAW) 20 CFR part 680450 (a), there are no renewals this year; all submissions are initial submissions, required forms are at https://wib.delawareworks.com/individual-training-account-forms.php. Please review the forms closely.

7. Demand Occupation List. The DWDB is aligning programs with the state’s Pathways to Prosperity initiative. The DWDB has reworked its Demand Occupation List. The Complete list is at http://bit.ly/2rzpICd. If your proposed training occupation doesn’t appear on the Demand Occupation List, a provider may want to check with ONET at https://www.onetonline.org/ to see if the occupation is listed by a different title that is on the list.

8. Flow of the Process. While it may seem initially daunting, the process is pretty straightforward.

- Providers will complete the ITA forms and submit them to DWDB No Later Than (NLT) 7 July 2017.
- Providers will enter proposed programs into DJL NLT 7 July. Providers are encouraged to begin immediately.
- DWDB staff will enter the program information on a spreadsheet NLT 7 JUL 2017
- DWDB Staff will double check DJL submissions continuously until 7 Jul 2017
- The Board will approve Providers and Programs on 11 July 2017
- The DWDB Staff will complete DJL approval of all programs NLT 14 July 2017

9. Other Important Considerations. It is important to remember only the board and/or Executive Committee can approve a program and these bodies only meet quarterly. Therefore, if you miss this opportunity, you will have to wait until September or October.

10. I am the point of contact for this memo at 302-761-8163 or William.Potter@state.de.us
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Delaware Workforce Investment Board