

THREE RIVERS WORKFORCE INVESTMENT BOARD

**Policies for Certifying Training Provider
Programs through PA CareerLink**

A Guide for Training Providers

PY 2008 - 2009



(Revised 11/07/08)

BACKGROUND

The Workforce Investment Act of 1998 (WIA) redesigned federal job training programs to make them more demand-driven and accountable. WIA emphasizes that the workforce development system must recognize the needs of local employers and develop education and training so that supply can meet demand. WIA legislation also mandates that providers of education and training meet certain performance standards. In order to have their programs and courses placed on the statewide list that is eligible to receive WIA funds, providers must become certified by both the local Workforce Investment Board and the State Department of Labor and Industry. Providers must reapply annually under “subsequent eligibility” status to remain on the list. Courses or programs of study are currently being reviewed for the July 1, 2008 to June 30, 2009 period.

Individual Training Accounts (ITAs)

Though the local Workforce Investment Boards and the State put consumer protections in place by creating the statewide list of certified providers, customers have the choice to seek training with any eligible provider. WIA training funds are provided through Individual Training Accounts (ITAs), which are vouchers given to eligible customers for occupational skill training. Within Allegheny County and the city of Pittsburgh, ITAs are valid for up to \$8,000, and they can be used for expenses such as tuition, required fees, and some supplies and certifications. PA CareerLink staff determine whether individuals are eligible and suitable for ITAs. After an ITA recipient has chosen a particular training provider, a contract can be executed between the training provider and the city of Pittsburgh or Allegheny County, depending on where the customer lives.

WIA emphasizes informed customer choice in training. The performance information training providers provide in their application for certification is made available to customers. PA CareerLink staff also counsel ITA customers about labor market trends and help guide them towards career paths that lead to self-sufficiency.

APPLICATION REQUIREMENTS

By applying for certification, providers agree to permit the Three Rivers Workforce Investment Board (TRWIB), the Pennsylvania Department of Labor and Industry, and the U.S. Department of Labor to audit their programs at any time, through requests for documentation, site visits, monitoring, etc.

Who Should Apply:

- Individual courses or programs, rather than providers or institutions, are placed on the statewide list. Providers must apply for certification for each course or program separately.
- For training providers or institutions with multiple sites, each site must apply as a separate provider.

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- Training providers may apply to any Workforce Investment Board (WIB) in Pennsylvania, but are encouraged to apply to the WIB closest to them. Each application needs to be submitted only once, to a single WIB. Once a provider is on the statewide list, customers throughout the state may choose that provider.
- Providers with programs on the statewide list must reapply annually.
- Providers of customized job training (CJT) or on-the-job training (OJT) do not need to apply for certification.

Providers apply online on the Commonwealth Workforce Development (CWDS) website. Key requirements of the application include:

1. Certification Category: The Pennsylvania Department of Education State Board of Private Licensed Schools has 14 categories for accrediting and licensure. Providers and their courses or programs of study that do not meet one of the first 13 categories will need to be licensed by the Board.
2. Performance Standards: Providers must meet the performance standards described in this document.
3. High Priority Occupations: Courses or programs of study must train for occupations that are in demand across Pennsylvania. In 2008, the PA Department of Labor and Industry implemented the High Priority Occupation List, which separates occupations by industry classification. For the 2008-2009 application, training courses/programs must train in an occupation that appears on the Three Rivers Regional High Priority Occupation List http://www.trwib.org/library/lmi/FINAL_2008_WIA_HPOs.pdf
4. Non-Discrimination and ADA Compliance: Providers must be accessible to individuals with disabilities under Section 504 of the Rehabilitation Act of 1973 and in accordance with the Americans with Disabilities Act (ADA). They must also have written policies and procedures in place to protect against discrimination on the basis of individuals' race, color, religion, sex, national origin, age, political affiliation or belief. For further information about Equal Opportunity (EO)/ADA Compliance, please contact Shad Henderson at (412) 552-7099 or via email at shenderson@trwib.org.

To complete the online application, providers must first register on the CWDS website. They may then submit individual courses or programs of study for certification via the same website.

CWDS: www.cwds.state.pa.us

Detailed instructions on using the CWDS website are provided in the [Training Provider Desk Aide](#) available through the TRWIB website.

CERTIFICATION CATEGORIES AND THE PRIVATE LICENSED SCHOOLS ACT

The Commonwealth of Pennsylvania Private Licensed School Act of 1974 (PLSA) requires proprietary career training institutions in the state to be licensed. The Act defines a private licensed school as:

A school or classes operated for profit or tuition that provides resident instruction to prepare an individual to pursue an occupation in the skilled trades, industry or business, or systematic instruction by correspondence or by telecommunication in a field of study.

There are 13 Certification Categories in which training providers are exempt:

1. Apprenticeships approved by the PA Bureau of Apprenticeship and Training;
2. Auctioneers;
3. Flight schools under Federal Aviation Administration regulation
4. Barber schools;
5. Cosmetology schools;
6. Private tutorial schools providing individual instruction;
7. Out-of state schools providing instruction at institutions within their own state.
8. Real estate schools;
9. Hospital schools;
10. Colleges and universities;
11. Schools operated by the Commonwealth or its political subdivisions, such as community colleges and vocational technical programs;
12. Schools for ambulance personnel, emergency medical technicians, firefighters, police, school bus drivers, school crossing guards, maids, butlers, and chauffeurs; and
13. Community-Based Organizations (CBOs) providing occupational skill training.

Training providers that do not meet one of these categories must obtain a PLSA license both for their entire institution and for their programs of study or courses. Certain courses such as classes for test taking skills and GED preparation may also be exempt.

Providers that are unsure of their status or that are interested in becoming certified can call the Pennsylvania Department of Education Division of Private Licensed Schools at (717) 783-8228, or visit the website at www.pde.state.pa.us/pls. The application to become a Private Licensed School may take approximately three months, and involves fees, as of November 2008 of \$1,500 for the application, \$700 per program, and \$500 for a site visit.

Documentation of Certification Category

The TRWIB may request providers to submit verification of their PLSA certification category. Documentation might include a copy of the applicable state license or current accreditation certificate. Providers and programs that are licensed by the Board of Private Licensed Schools may in some cases be required to submit form PDE-3808 as documentation.

PERFORMANCE STANDARDS

Five (5) performance criteria are established for **two (2) distinct populations**; 1) **WIA**, and 2) **ALL** (WIA and Non-WIA). Non-WIA would include private pay students, Trade Act, EARN, etc. All training courses/programs must meet at least eight (8) of the ten (10) following measures. **However, if a course/program serves no WIA clients, it must meet at least three (3) of the five (5) measures for the ALL population**

The reporting period for PY2008-2009 applications is October 1, 2005 - September 30, 2007.

Performance Measures for ALL Program Participants	Standards
<p>Program Completion (ALL) This measure is calculated by dividing the number of program completers by the number of participants scheduled to complete during the reporting period</p>	70%
<p>Entered Unsubsidized Employment (ALL) This measure is calculated by dividing the number of program completers who entered unsubsidized employment (excluding individuals who were employed when they entered the program or plan to continue their education after this training) by the number of individuals who completed the program during the reporting period.</p>	80%
<p>Employment Retention (ALL) This measure is calculated by dividing the number of individuals who entered unsubsidized employment by the number of individuals who entered unsubsidized employment in the first quarter after completing the program and retained employment through the 3rd quarter.</p>	82%
<p>Average Quarterly Wage (ALL) The calculation is the amount of quarterly wages divided by the number of individuals who are employed in the second and third quarters. This is based on the combined wages reported for both the second and third quarters.</p>	\$5211
<p>Program Graduate/Certificate (ALL) This measure is calculated by dividing the number of individuals who completed and attained a certificate by the number of program completers.</p>	60%

Performance Measures for WIA-Funded Participants	Standards
<p>Program Completion (WIA) This measure is calculated by dividing the number of program completers by the number of participants scheduled to complete during the reporting period</p>	70%
<p>Entered Unsubsidized Employment (WIA) This measure is calculated by dividing the number of program completers who entered unsubsidized employment (excluding individuals who were employed when they entered the program or plan to continue their education after this training) by the number of individuals who completed the program during the reporting period.</p>	80%
<p>Employment Retention (WIA) This measure is calculated by dividing the number of individuals who entered unsubsidized employment by the number of individuals who entered unsubsidized employment in the first quarter after completing the program and retained employment through the 3rd quarter.</p>	82%
<p>Average Quarterly Wage (WIA) The calculation is the amount of quarterly wages divided by the number of individuals who are employed in the second and third quarters. This is based on the combined wages reported for both the second and third quarters.</p>	\$5211
<p>Program Graduate/Certificate (WIA) This measure is calculated by dividing the number of individuals who completed and attained a certificate by the number of program completers.</p>	60%

Threshold Exception Criteria

In an effort to not arbitrarily exclude programs from the statewide list that serve a small universe of students or have no WIA clients, performance levels will be considered met under the following circumstances:

WIA Zero Participant Threshold

If a program serves no WIA clients during the reporting period, the program is considered to have met performance for the **WIA measures**; or

Small Universe Threshold Exception

If a program serves less than ten (10) during the reporting period, it will not be held to performance.

Zero Enrollment

If a course/program did not have any enrollments during the reporting, it will not be held to performance. Training providers will indicate this by selecting the statement. **“This course/program did not have any enrollments during the reporting period”**.

New Programs

The requirement for submitting student data will be waived if the training provider has recently developed the training course/program. Only those courses/programs defined as new, e.g. training course/program has been offered less than twelve (12) months, are exempt from reporting performance information. However, two or more year programs will be considered new until it has its first graduating class.

Calculation of Performance Data and Collection Methods

A significant change to the performance requirements will be the calculation of performance. Obtaining employment and wage information from individuals has continued to be a burden for training providers. The process prior to July 1, 2006 required training providers to conduct follow-up on former students and data enter the performance information manually through the PA CareerLink website. Under the new process, training providers will simply provide raw data on individuals participating in each course/program for a specified time period to the Department of Labor & Industry by uploading an Excel spreadsheet containing the required data elements. Detailed instructions on how to enter performance information can be found on pages 21 – 25 of the [Training Provider Desk Aide](#) available through the TRWIB website.

THE CERTIFICATION PROCESS

After submitting an online application, please allow up to 60 working days for approval. The TRWIB may take up to 30 days to review the application. If the TRWIB approves a course, it will then be transmitted to the State for review. The State may take up to 30 additional working days. To view the status of your application after it has been submitted, you may check your training provider business folder on the CWDS website.

Courses or programs that have been approved by the State will appear on the CWDS. Courses approved for the 2008-2009 period will remain on the website through June 30, 2009. If a local WIB deems that an application is ineligible, the TRWIB will issue a denial notice within thirty working days. The State also has the right to reject a program.

If the State or local board determines the provider has submitted inaccurate information, eligibility to receive funds may be terminated for not less than 2 years. If the provider is determined to be noncompliant with any part of the Act, eligibility to receive funds may be terminated until a corrective action plan is received and approved by the State Department of Labor and Industry. A provider whose eligibility is terminated shall be liable for repayment. No new referrals can be made if the program/provider is not on the statewide list.

Appeal

Providers have the right to appeal rejected training programs, a denial of continuing eligibility, suspensions, and termination of eligibility. Appeals can be made against either the TRWIB or the State and must be submitted within 20 working days from the date of rejection. The TRWIB and/or the State will respond within 20 days of receipt of the appeal. An on-line appeal process is available on the CWDS website.

If you have any questions regarding the process of certification, please contact Shad Henderson at the Three Rivers Workforce Investment Board, (412) 552-7099 or shenderson@trwib.org, or Stefanie Stage at the Pennsylvania Department of Labor and Industry, (717) 346-1579 or sstage@state.pa.us.

You may also consult the Workforce Investment Information Notices (WIINs) posted on the PA Workforce Implementation website at: www.paworkforce.state.pa.us.