

Career Pathways: Using the State Eligible Training Provider List to Support Quality & Coordination

STATE PLAN LOCAL PLAN POLICIES & GUIDANCE BUDGET CHOICES

CLASP's [Opportunities for Action](#) is a series of short memos with recommendations for state and local areas to fully realize the options in the Workforce Innovation and Opportunity Act (WIOA) to help low-income and lower-skilled youth and adults achieve economic success.

State Plan

States' Unified/Combined Plans must define training services for individuals with barriers to employment. WIOA title I-B training funds, with few exceptions, can only fund training programs on a state's Eligible Training Provider List (ETPL). The ETPL is a list of state-approved training providers and their state-approved training programs. Programs eligible under the Workforce Investment Act (largely on eligibility lists in states operating under waivers for WIA requirements) are grandfathered onto the WIOA ETPL until December 31, 2015. After that, states must have an *eligibility continuation process* in place, as specified in [TEGL 41-14, Operating Guidance for the WIOA Title I Training Provider Eligibility Transition](#).

Under WIOA, states are responsible for ensuring the quality and value of eligible training programs on the ETPL, as well as measuring performance information about each program. State plans should include robust quality standards for the range of programs on the ETPL, including career pathway programs. While WIOA performance metrics will tell the story of outcomes, state standards should guard against incentives to “cream” the population that receives WIOA training services by ensuring that training providers focus on helping individuals with barriers to employment success.

One example of quality standards for workforce development education and training programs comes from the [Minneapolis/St. Paul Workforce Innovation Network](#), whose Shared Measures/Effective Practice team has drafted the following standards for workforce education and training programs:

- **SUPPORT PARTICIPANTS COMPREHENSIVELY:** Provide holistic support services; embed intensive career counseling and navigation; and use integrated education and training methods.
- **CONNECT PARTICIPANTS TO CAREERS:** Guide career training with comprehensive intake and assessment; teach people how to build a career; and link participant outcomes to the next step in education, training, and/or employment.
- **ALIGN TO THE LABOR MARKET:** Use Labor Market Information (LMI) to shape occupationally based programming; engage multiple employers in industry clusters; and embed work experiences and expect work behaviors.
- **CONNECT & LEVERAGE RESOURCES:** Connect to community; partner to provide a diversity of services; and braid funding sources.
- **IMPROVE OVER TIME:** Conduct real-time evaluation for continuous improvement; understand analysis and data; and respond to evaluation with changed practice.

State plans should include a description of quality standards as part of the ETPL initial and continuing eligibility processes.

Policies & Guidance

Under WIA, the number and quality of training programs varied widely from state to state and many critical partnership opportunities were missed because of eligibility waivers that allowed providers to continue to work in isolation from the workforce system. WIOA's career pathway focus makes it even more critical to define services and identify career pathway participants across programs. States should start now to use the ETPL process to lay the groundwork for better service alignment and, consequently, better results.

Career pathway programs for WIOA titles I-IV and their partnering education systems are expressly defined in the law. CLASP recommends that states establish a recognition process to verify that a career pathway program meets the WIOA definition. States should then highlight such state-recognized programs on the ETPL in order to facilitate the enrollment of title I participants in career pathways and the co-enrollment of title I adults and youth and title IV participants in title II and Carl D. Perkins career and technical education career pathway programs. And these participants, regardless of funding source, need to be identified in administrative data—using "treatment flags"—as being part of a career pathway program.

Even in states where career pathway programs are proliferating, participant data are largely kept separate. Consequently, the career pathway programs continue to be treated as separate silos outside the regular workforce programs. Career pathway data should be shared across partnering agencies and institutions and across funding streams. The workforce system needs to include career pathway participant data throughout case management systems across all WIOA-funded programs. Additionally, training providers on the ETPL should provide these data, identifying participants in a state-recognized career pathway program so that individuals' career pathway participant status endures in the state's database beyond the immediate training period, reflecting the ongoing nature of career pathway participation. Postsecondary education management information systems may use a cohort code or other identification mechanism to indicate individuals are receiving the career pathway "treatment." This "treatment flag" should also exist in WIOA case management systems, regardless of WIOA funding stream, to identify participants in designated career pathway programs. State agencies operating WIOA programs will need to develop a process for ensuring flags are used in their own case management systems and in the Eligible Training Providers' course management systems.

Many WIOA planning conversations have focused on big-picture collaboration and alignment. New guidance gives partners some concrete steps to make aligned programming a reality.

TEGL 41-14 and accompanying [web guidance](#) clearly outline the initial and continuing eligibility requirements for training providers and emphasize that, after an initial transition period, ETPL procedures will eventually ask for WIOA section 116 performance indicators to be used in continuing eligibility decisions. TEGL 41-14 also makes it clear that waivers will no longer be granted for these data and that Governors will need to identify agents and funding to make this data sharing possible.

While labor market outcomes of training will be identified via unemployment insurance wage records, credential attainment and other required information should come from the education provider's management information system. Having individuals "flagged" in postsecondary education data systems will be especially useful for counting measureable skill gains under WIOA as participants accumulate credits and credentials toward a degree.

States will also need to identify credentials from outside the traditional education data collection—including career and technical education technical skill assessments that might be used in defining measureable skill gain, apprenticeship standards, and industry-recognized credentials.

Beyond initial and continuing eligibility processes, states will also need to establish an ETPL reporting process. States with existing postsecondary education consumer reporting systems may be able to leverage these investments to support ETPL reporting requirements under WIOA. States without existing centralized

postsecondary data exchange processes should begin to forge these connections now, given the lead times involved. Devolving the data exchange coordination and reporting issues to the individual training providers runs the risk of losing significant numbers of otherwise qualified training programs because the burden might drive providers to opt out of maintaining their WIOA eligibility. Data alignment can help move systems to seamless service delivery.

Related CLASP resources: [Comments on proposed regulations](#); [Shared Accountability in WIOA and Career Pathways](#).

Questions? Contact [Judy Mortrude](#), director of CLASP's Alliance for Quality Career Pathways.

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