

# *College Completion through the Workforce System*

*The Role of the Eligible Training Provider List in Training Choices*

Education and Employment Research Center



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# College Completion through the Workforce System: The Role of the Eligible Training Provider List in Training Choices

## INTRODUCTION

Employment is a challenge in the current economic climate. The workforce investment system is on the front lines of efforts to help match workers with jobs and improve earnings, a major undertaking in a country where unemployment as of July 2013 was at 7.4% and nearly 2 out of 5 of the unemployed have been jobless for over 27 weeks<sup>1</sup>. Tools available for frontline staff in local workforce investment areas (LWIAs) to improve employment outcomes often emphasize short-term vocational training, with the goal of getting clients back to work quickly. However, another short-term option is often overlooked: assisting clients who have attended college but have not completed an associate or bachelor's degree (nearly 22% of Americans aged 25–64 in 2011<sup>2</sup>). Taking the final step to complete a degree can help these disengaged students capitalize on prior investments in education, potentially realizing even greater returns from skills development than vocational training. Given existing data on how education level affects employability and earnings, this approach can also improve clients' employment prospects, job stability, and earning power.

The Adult College Completion (ACC) initiative is an interdisciplinary collaboration between researchers and workforce development experts at the Rutgers School of Management and Labor Relations (SMLR) and the National Association of Workforce Boards (NAWB), with funding from the Lumina Foundation for Education. The ACC project is currently testing the feasibility of offering college completion as an option through the workforce investment system in four states: Mississippi, Pennsylvania, Indiana, and Oklahoma.

We define *adult college completion* (ACC) as the completion of an associates or bachelors-level degree, and the initiative focuses on helping adults who have previously disengaged from college education within 30 credit-hours of degree completion. The ACC team additionally emphasizes the benefit of portable, stackable degrees, which allow adult learners to re-enter the job market quickly but also create pathways for future education and credentialing<sup>3</sup>. A key project component is identifying policies that help or hinder this goal. To that end, the team is identifying the reasons why LWIAs may either overlook college completion for disengaged students as a mechanism for short-term training or may be unable to support completion.

This report examines one such policy, the eligible training provider list (ETPL), sometimes also called the approved provider list or eligible provider list, and how it can facilitate or impede college completion. The report draws on data from a process evaluation of the project that includes interviews with workforce investment staff at managerial and frontline levels in two states. The experience of the Adult College Completion project to date indicates that minor changes at the state or local level can facilitate use of the ETPL for college completion. The report describes how four Local Workforce Investment Areas (LWIAs) in two states have

worked with the ETPL policies to support college completion and provides recommendations for other states seeking to do the same.

### **What is an Eligible Training Provider List?**

Most publicly funded training provided through the workforce investment system is structured by the Workforce Investment Act (WIA) of 1998. Under the WIA, Workforce Investment Boards (WIBs) provide guidance for the formation of plans and policies for services delivered in individual Local Workforce Investment Areas.

Workforce investment clients approved for training supported by Title I WIA funds are given individual training accounts (ITAs). The ETPLs, or approved provider lists, indicates which training courses the clients may take using ITA dollars and which training providers have been approved to offer these courses.<sup>4</sup> The list is a compilation of training programs that have been approved by local boards in partnership with state officials<sup>5</sup> and serves two primary purposes: maximizing efficiency in addressing WIA objectives while also maximizing client choice. ETPL policies vary across states. In Florida, for example, in-state accredited colleges, community colleges, and some technical schools are automatically eligible training providers for programs that lead to degrees or certificates, subject to ongoing accreditation, reporting and performance requirements.<sup>6</sup> In Kansas, training program providers make application for initial eligibility with local workforce boards, and each Kansas local area can set its own procedures and eligibility criteria for ETPs.<sup>7</sup> Some states and local areas accept online learning programs and some do not. Some require that a training provider have a physical presence in their state and some do not. Some states accept the schools as a whole and some accept specific courses. The complex and varied processes can be an obstacle to some programs.

Regarding WIA objectives, the Workforce Investment Act emphasizes short-term training that will allow clients to move quickly into work, with training prioritized for in-demand and growing occupations within the clients' local labor market. In their current forms, the ETPL lists align with WIA's aim of training workers for such occupations. Courses and programs on the lists typically reflect available jobs in industries physically located in the workforce area where training is offered.<sup>8</sup> The lists consists of mostly short-term and some long-term programs at eligible institutions that lead to a certificate or degree. The eligible institutions are usually community colleges, technical education providers, and proprietary training schools that have the capacity to train workers for jobs currently in demand by employers. Training providers must formally apply to be on the list, though some states automatically accept in-state accredited programs subject to ongoing reporting and performance requirements.

Although the workforce investment system does not prioritize college degree completion as a goal, in some LWIAs there are programs and courses on the ETPL that can contribute to college completion, including specific degree programs. The basic rules about which providers are eligible to apply to be on the list stipulate that providers must offer training for skills needed for a specific occupation or for a certificate, associate degree, or baccalaureate degree that qualifies

an individual to enter an in-demand occupation. Of course, postsecondary institutions such as colleges and universities are among the providers who may qualify under such eligibility rules.<sup>9</sup> Yet a number of LWIA staff in Mississippi and Pennsylvania interviewed through the ACC project prioritized the ETPL as one of the greatest obstacles to college completion through the workforce system they encountered.

## CHALLENGES

ETPL-related challenges to college completion can be classified into three categories (Table 1). First, in some states and local areas, the ETPL or approved provider list includes limited options for funding credits toward a degree or for degree completion. Second, LWIA staff may not be aware of the options for adapting the ETPL to include for-credit courses and degrees. Third, institutions of higher learning may not be aware that they can place for-credit training on the ETPL. We will discuss each challenge in turn.

### *Limited ETPL options and LWIA staff approaches*

Local areas require that training funding be consistent with what some areas call the high-demand occupation list: a list of occupations LWIBs emphasize in prioritizing training. That list is drawn largely from labor market projections generated by state labor departments and is sometimes modified locally with LWIB input to reflect local labor market realities. In some cases, this can prove to be an obstacle to college completion.

One problem is that even though disengaged students may have been pursuing a degree previously that relates to a high-demand field, there may be no corresponding option for the degree on the ETPL. A review of the ETPLs in local areas in Mississippi and Pennsylvania found that while they included many certificate and license-oriented programs for occupations such as Certified Nursing Assistant and Emergency Medical Technician, local areas in Mississippi had far fewer providers listed that had programs leading to the completion of an associate's or a bachelor's degree.<sup>10</sup> Degrees that were on the ETPL in local areas in Mississippi were closely tied to high-demand occupations, which is necessary for compatibility with the use of WIA funds, and were almost exclusively Associate of Applied Science (AAS) degrees. Of the total offerings on that ETPL, 26% were in healthcare, 11% were in information technology, and over a third were in trades such as automotive, cosmetology, and culinary studies. For AAS degrees, about 27% of offerings were in health and 69% were in IT. While it is certainly important to ensure that training lead to employment, these offerings can be extremely limiting to some clients. These fields often have very specific educational prerequisites and requirements, reducing the benefit of having completed some college previously for near-completers. Furthermore, while an AAS degree is a useful and important credential that is the right choice for some clients, it can be a terminal degree<sup>11</sup>, meaning that the pathway to future education and credentialing is not always as clear.

**Table 1. Overview: Using the ETPL to Facilitate College Completion**

Challenges	Examples	Potential solutions
<i>Limited ETPL options</i>	<ul style="list-style-type: none"> <li>• Programs listed do not include options for college beyond vocational degrees (AAS), which can often be terminal.</li> <li>• Degree options can be limited due to interpretation of high-priority occupation lists.</li> <li>• For-credit courses are listed, but non-credit courses often needed for completion are not (e.g., algebra and public speaking).</li> <li>• Full programs may be listed, but no provision is made for students who only need a few courses to complete a degree in progress.</li> <li>• Limited options to alter the ETPL, hindering responsiveness to educational requirements.</li> </ul>	<ul style="list-style-type: none"> <li>• Think creatively about occupations requiring degrees that fall into sectors experiencing high demand. For example, an AA degree can be earned in accounting, criminal justice, and other areas that can lead to an in-demand job.</li> <li>• Add general “for-credit course” option to ETPLs so clients can take individual courses needed to finish a degree.<sup>12</sup></li> <li>• Expand degree choices beyond AAS and similar degrees. Add AA, AS, BA, BS, and other four year degrees.</li> <li>• Allow changes to the ETPL on an ongoing or case-by-case basis.</li> <li>• Examine individual state and local ETPL policies for barriers.</li> <li>• Advocate for national ETPL application and approval guidelines to clarify and streamline the process for LWIAs and providers.</li> </ul>
<i>LWIA staff approach</i>	<ul style="list-style-type: none"> <li>• Local WIA staff may not be aware of options for petitioning to add to the ETPL, where they exist.</li> <li>• Local WIA frontline staff may not be prepared to advise clients on degree options in higher education.</li> </ul>	<ul style="list-style-type: none"> <li>• Train frontline WIA staff on how the ETPL can be used to accommodate ACC.</li> <li>• Create or strengthen feedback mechanisms in LWIAs to ensure that frontline workers are able to contribute to ETPL adjustments.</li> <li>• Educate frontline staff to enable them to communicate the benefit of stackable, portable credentials to clients.</li> </ul>
<i>Education provider approach</i>	<ul style="list-style-type: none"> <li>• Providers do not apply to list courses or degree programs for college credit or are not aware that they should do so.</li> </ul>	<ul style="list-style-type: none"> <li>• LWIB or State Agency works with local higher-education institutions to generate awareness about the possibility of listing college degrees on the ETPL.</li> <li>• Develop a relationship with staff working on for-credit offerings at community and four-year colleges.</li> <li>• Maintain contact with institutions so courses and programs can be submitted for acceptance by the LWIB or State as they are requested by clients, as consistent with the high-demand occupation list.</li> </ul>

In Pennsylvania, more bachelor’s degrees and associate of arts degrees were available to clients, but again, the majority of degrees offered were AAS degrees. Pennsylvania also has some associate of applied technology (ATT) degrees on its list. While AAT degrees can also be terminal, one LWIA had a good policy in place for promoting college completion: an articulation agreement between the technical training provider and a community college so that credits for some of the programs could be applied toward the more versatile associate of arts degree. In that same community college, some AAS degrees on the ETPL were fully or partially transferrable toward other college degrees. In essence, these agreements turned often-terminal vocational degrees into stackable degrees. The existence of AA and BA degrees on the list, as well as these articulation agreements, together mean that more student clients would have an opportunity to stack additional credentials on training supported by the local area. In short, these students were given clear pathways to lifelong learning, further increasing the impact of the ITA investment in their talents.

In both states, the ETPL was limited to full programs rather than the individual courses clients may need to complete a degree they had previously started. For example, a client could go through a full Licensed Practical Nursing (LPN) program that includes English composition and algebra along with other nursing courses, but a single course requirement alone that is needed to complete a degree might not be an option on the ETPL for all clients with some credits.

Finally, the process of modifying the ETPL itself can be quite cumbersome. Regulations establish parameters for the development of approved lists.<sup>13</sup> Governors establish eligibility criteria for the list, set criteria for maintaining eligibility, and designate state agencies to lead the process of creating the list. Local areas may submit lists and have related responsibilities established by the Governor. LWIBs may be able to change performance requirements or require additional information from providers, can make recommendations to the Governor about the determination of eligibility, and they often receive applications for providers under WIA Title I. They may also determine procedures for some types of programs; for others, the Governor establishes procedures published in the state plan. Providers that have campuses or offer online training in multiple states often find it daunting to seek inclusion on multiple lists with widely varying application procedures, and may make limited applications.

**Table 2: Comparison of ETPL Offerings in Two Sample LWIAs one in each state**

Percentage of ETPL offerings by category	Local WIA 1 Mississippi	Local WIA 1 Pennsylvania
Any degree, including LPN/RN	44%	48%
AAS, AAT or AST degrees <sup>14</sup>	42%	15%
AA, AS, or bachelor’s degrees	3%	27%
Master’s degrees	N/A	6%
Certification/Certificate <sup>15</sup>	44%	20%
Diploma	8%	15%
Other/Unknown	3%	17%



Research for the ACC project indicates that the process for updating the ETPL varies at the local and state levels, leading to differences across areas in the ability of case managers working with clients to fund college training not currently on the list, as described in the next section.

### *Education provider approach to ETPL*

Education providers must apply to have courses and degrees listed on the ETPL. Yet higher-education institutions are not always aware of how they can use the ETPL. In fact, in one LWIA in Mississippi, an employee of a community college who had a very close relationship with the local One Stop, which in fact is co-located at the college, was unaware that college credit options could even be listed on the ETPL. This employee indicated that previously the area had only funded associates of applied science, but now sought to fund AA degrees that in some cases may offer broader credit transfer to universities than AAS degrees. The following comment from a workforce area that has long supported clients in completing college further illustrates the challenge:

...[E]very year the schools have to resubmit their programs for approval. Typically, what we find, though, is schools do not submit a program for approval unless there is interest in that program. For example, if no one has been interested in accounting for a couple of years, they won't necessarily submit that for approval until someone's interested in it.

[The term of the ETPL] runs from July 1 to June 30, so every June 30 all of the programs drop off the list because every year there is usually a new high priority occupation list...and schools have to resubmit for approval. They have to be first approved at the local level, the WIB level, then go to the state for final approval.

*(Frontline workforce investment staff, LWIA 2, Mississippi)*

It is evident from comments of this staff person, as well as others we have spoken with, that the process of getting on the ETPL requires knowledge of the workforce investment system and navigation of multiple steps. It is a time and resource-intensive process. Where colleges have a perception that the workforce investment system is about certificates rather than degrees, schools may not be proactive in working with the system. Schools may also weigh whether the time and effort to submit and be approved, which includes gathering data about programs and reporting on results, is worth the investment.

### **POTENTIAL SOLUTIONS**

Though challenges abound, our research team did identify some promising innovations in the field. In interviews, workforce investment staff identified the steps they have taken so that their ETPLs can facilitate college completion, some as part of the ACC project. Longstanding practices that support completion have often taken the form of flexibility and innovation on the

part of individual staff at the local WIA level. One state has gone further and implemented a universal solution that addresses the problem across local areas. In both cases, the result is an expanded ETPL list that includes local community colleges and universities with degrees that align with the list of demand occupations. Statewide policy clarifications and adjustments may go a long way to help local WIAs adapt ETPLs to be more supportive of college completion.

Another way to encourage such change is to look for points of intervention in the culture, practice, and relationship contexts of LWIAs and education providers. A number of local areas working with the ACC project are considering changing their approach to the ETPLs as part of a new effort to expand college completion through the workforce system. In Mississippi, college staff in two local areas have become aware of the value of adding associate of arts degree options to the ETPL, as these are more often stackable, transferable credentials than are AAS degrees. One respondent employed at a community college that works closely with the local One Stop in Local WIA 2 (Mississippi), described the motivation behind adding the AA degree to the ETPL:

[Some clients] wanted to have that tech degree—I'm a welder, a machinist, I'm a draftsman—and go get a job doing that. But...I'm seeing, that the AA degree...shows the employer that this person is educable and educated... and it shows you're a completer, you complete, and it's a stackable credential, and you're making suggestions as to who is going to move up the ladder. It can make a difference.... [Our community college] and others have not had the AA degree on [the ETPL] before, but I found out that some do from going to these [project] meetings and I worked...to get it on ours.... People would have argued no, you don't need the AA degree. I have come to learn how valuable it is.... My vision has been broadened.

*(Frontline workforce investment staff, LWIA 2, Mississippi)*

Working with higher-education institutions on how they list their educational offerings on the ETPL can also broaden opportunities for assisting near-completers. In some local areas, respondents indicate that it may be possible when an individual client needs a course or degree that is not on the approved list to add an item to this list. In Pennsylvania, LWIA 1 works closely with community colleges to encourage them to apply to list degrees on the approved list. This approach dates from the area's first steps to implement the WIA, when information sessions were held for training providers. One respondent describes how doing so can facilitate completion:

If a training provider put a bachelor's degree on the system, which they can, they can put a generalized program on and then if somebody comes in and only needs maybe 18 credits to complete, we can write the ITA for less than what that total cost is on the system. You just can't write it for more. So what I try to tell the training providers is, put your associate degree program on. If you want to make it simple for you, then anybody that takes that program and only needs a piece of it, you can tailor and make your individual

account or ITA for less than what that total cost is, but you can't make it for more.... It would be silly for them to put a 15-credit program on [and] then [when] somebody else comes through the door, put a 26-credit program on for completion.

*(Workforce investment managerial level staff, LWIA 1, Pennsylvania)*

Building strong relationships with colleges and universities that allow for the ongoing exchange of information is important. For example, such relationships helped community college staff in Pennsylvania to become aware of the possibility of expanding for-credit options on the ETPL. The respondent from Pennsylvania quoted above also described how "over the years you get...to know more providers." In this state, the local area has also begun working with a particular university to provide information for students on the LWIAs website to help them determine what is needed to complete.

As has been mentioned above, policies for updating the ETPL vary by state and sometimes local areas, which can hinder the ability to make changes needed to serve near-completers. In LWIA 1 in Mississippi, a higher-education staff member said the college would have to wait to add new degrees until the next biannual applications period, which served to delay their ability to serve students interested in college and placed further delays on future changes as lessons were learned and needed additions were recognized. However, in LWIA 2, which has recently reduced its application period to one time a year and allows some flexibility in that, a staff member described the option of case-by-case consideration, which helps the LWIAs respond to the needs of clients more quickly:

[The school] can contact me to allow an exception to the ETPL period and I can.... If there's a demand for it, we can add it.... Our board allows me flexibility to go ahead and get it approved.... If it is in need, a demand occupation, et cetera, they allow us a lot of flexibility. Boards only meet one time a quarter, so I would have to wait [otherwise].

*(Workforce investment managerial level staff, LWIA 2, Mississippi)*

## CONCLUSION

The results reported in this brief reflect a preliminary interpretation of data emerging from the Adult College Completion project. Further research and analysis is ongoing, with a focus on whether and how these different practices may facilitate college completion.

For local WIAs seeking to help students complete degrees, the ETPL is one of the most obvious obstacles at present, despite formal policies that do not prohibit college support. However, simple changes, such as adjusting policies at the state level and educating frontline LWIA workers and education providers on how to work with the ETPL to facilitate completion, can open the door to greater support for college completion in the workforce system.

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- <sup>1</sup> Bureau of Labor Statistics. August 2, 2013. "News Release: The Employment Situation–July 2013." Available: <http://www.bls.gov/news.release/pdf/empsit.pdf>.
- <sup>2</sup> Lumina Foundation. "A Stronger Nation Through Higher Education." Available: [http://www.luminafoundation.org/publications/A\\_stronger\\_nation\\_through\\_higher\\_education-2013.pdf](http://www.luminafoundation.org/publications/A_stronger_nation_through_higher_education-2013.pdf).
- <sup>3</sup> Austin, James T., Gail O. Mellow, Mitch Rosin, and Marlene B. Seltzer. (2012). "Portable, Stackable Credentials: A New Education Model for Industry-specific Career Pathways." McGraw-Hill Research Foundation. Retrieved from [http://mcgraw-hillresearchfoundation.org/wp-content/uploads/2012/11/PSC\\_white\\_paper.pdf](http://mcgraw-hillresearchfoundation.org/wp-content/uploads/2012/11/PSC_white_paper.pdf)
- <sup>4</sup> Van Horn, Carl E., and Aaron Fichtner. 2011. "Eligible Training Provider Lists and Consumer Report Cards." In *The Workforce Investment Act: Implementation Experiences and Evaluation Findings*, Douglas J. Besharov and Phoebe H. Cottingham, eds. Kalamazoo, MI: W.E. Upjohn Institute for Employment Research, pp. 153-173.
- <sup>5</sup> Workforce Investment Act Final Rule. August 11, 2000. *Federal Register*, 65 (156), GAO-08-547 Workforce Development. This discussion is also informed by Van Horn and Fichtner 2012.
- <sup>6</sup> Florida Department of Economic Opportunity, Division of Workforce Services, Bureau of One-Stop and Program Support. Selection and Retention of Eligible Training Providers under the Workforce Investment Act of 1998 and Florida Statutes. (FG OSPS-77 May 13, 2013, Revised August 16, 2013). <http://www.floridajobs.org/PDG/guidancepapers/FG-ETPL.pdf>
- <sup>7</sup> Kansas Department of Workforce Services. Kansas Eligible Training Provider List (for Adults and Dislocated Workers Receiving WIA Title IB Training Services). (3-16-01, January 18, 2006, Revised October 30, 2013). <http://kwppolicies.kansascommerce.com/KANSASWORKS%20POLICIES/3-16-01%20Eligible%20Training%20Provider%20List%20-%20Approved%2010%2030%2013.pdf>
- <sup>8</sup> Bradley, D. H. (January 10, 2011). *The Workforce Investment Act and the One-Stop Delivery System*. Washington, D.C.: Congressional Research Service. Report 7-5700.
- <sup>9</sup> Federal Register 2000; Government Accountability Office (2008). "Community Colleges and One-Stop Centers Collaborate to Meet 21st Century Workforce Needs." Washington, D.C.: GAO. GAO-08-547.
- <sup>10</sup> Lists were obtained in March 2012.
- <sup>11</sup> AAS degrees in healthcare are not always terminal, as many colleges and universities have created pathways to stack healthcare credentials toward further degrees. For a guide to LWIA ETPLs in the two study states, please see Table 2.
- <sup>12</sup> One example given by staff at a community college familiar with the workforce investment system was that of a public speaking course that might be all that stands in the way of a degree in another major.
- <sup>13</sup> Federal Register 2000; Government Accountability Office (2008). "Community Colleges and One-Stop Centers Collaborate to Meet 21st Century Workforce Needs." Washington, D.C.: GAO. GAO-08-547.
- <sup>14</sup> AAS degrees include pharmacy technician, nursing, heating and air conditioning, office system technician, electronics technology, and others. AAT degrees, offered only in Pennsylvania, include welding, carpentry, and electrical occupations.
- <sup>15</sup> Specifically includes certificate, certification, credential, certificate of completion, certificate of participation, and certificate of proficiency.