



CATAWBA LOCAL INSTRUCTION 23-14 (REVISION FROM LOCAL INSTRUCTION 17-17)

TO: LOCAL CATAWBA WORKFORCE DEVELOPMENT AREA

DATE: March 28, 2018

REVISION DATE: September 21, 2023

SUBJECT: Training Program Guidelines for the Eligible Training Provider List

The Eligible Training Provider List (ETPL) is compiled to provide Title I participants with a full array of training programs designed to meet their needs for employment or a career pathway. The Workforce Innovation and Opportunity Act (WIOA) requires states to establish and maintain an ETPL, including procedures to determine eligibility for training providers and training programs. Only the approved eligible training providers and programs listed on the South Carolina ETPL may be utilized for WIOA Individual Training Accounts (ITAS). The following guidelines must be used when approving training programs for the ETPL

A training program must:

- provide a structured regimen/curriculum;
- include an ongoing evaluation of progress;
- include the ability to evaluate successful completions;
- lead to a recognized postsecondary credential; and
- lead to a specific job or groups of jobs that are related to the training received

WIOA sec. 3(52), defines a recognized postsecondary credential as a "credential consisting of an industry-recognized certificate or certification, a certificate of completion of an apprenticeship, a license recognized by the State involved or Federal government, or an associate or baccalaureate degree." Per Training and Employment Guidance Letter (TEGL) 10-16, Change I, "a recognized postsecondary credential is awarded in recognition of an individual's attainment of measurable technical or industry/occupational skills necessary to obtain employment or advance within an industry/occupation. These technical or industry/occupational skills generally are based on standards developed or endorsed by employers or industry associations. Certificates awarded by workforce development boards (WDBs) and work readiness certificates are not included in this definition because neither type of certificate is recognized industry-wide, nor documents the measurable technical or industry/occupational skills necessary to gain employment or advancement within an occupation. Likewise, such certificates must recognize technical or industry/occupational skills for the specific industry/occupation rather than general skills related to safety, hygiene, etc., even if such general skills certificates are broadly required to qualify for entry-level employment or advancement in employment."

Further, the U.S. Department of Labor (DOL) has previously clarified that CPR certificates and OSHA certificates do not meet its credential definition. DOL specifically stated, "While a CPR or an OSHA training may provide benefit to participants as they begin to gain general knowledge about occupations and occupational standards, participants are unlikely to gain employment or advance within an occupation based solely upon receiving a CPR or an OSHA certificate." The State views ServSafe, and customer service programs in general, as being in the same category as CPR and OSHA. Therefore, they do not meet the definition of a recognized postsecondary credential for WIOA and are not considered as training programs for the ETPL.

WIOA defines pre-apprenticeship as a program or set of strategies designed to prepare individuals to enter and succeed in a RAP (Registered Apprenticeship Program) and has a documented partnership with at least one, if not more RAP's.

The Catawba Region requires proof of partnership with DOL Registered Apprenticeships with local employer partners related to each training completed for employment opportunities.

Utilizing the training program guidelines as stated above, each Local Workforce Development Area (LWDA) must conduct an audit of programs in the Palmetto Academic Training hub (PATH). An evaluation should be performed on all programs currently in PATH, as well as any submitted/pending programs. Programs that do not meet the above guidelines must be denied and removed from PATH. Specifically, CPR, OSHA, ServSafe, and general customer service programs must be removed. Training providers with programs that are denied must be given a program denial notification to include LWDA appeal procedures. Programs that do not meet the ETPL requirements may align with the SC Works Online Services (SCWOS) 215 (Short-term Pre-vocational Services) activity code for adults and dislocated workers or the 401 (Job Readiness) activity code for youth.

Action: Please ensure that all appropriate staff receive and understand this policy.

Inquiries: Questions may be directed to abaker@catawbacog.org.



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