



SOUTH FLORIDA WORKFORCE INVESTMENT BOARD

ECONOMIC DEVELOPMENT AND INDUSTRY SECTOR (EDIS) SUB-COMMITTEE MEETING

**Thursday, November 18, 2010
1:30 PM**

South Florida Workforce Investment Board Headquarters
7300 Corporate Center Drive, Suite 500
Miami, FL 33126

AGENDA

1. Call to Order and Introductions
2. Approval of EDIS Subcommittee Meeting Minutes
 - A. May 24, 2010
3. Information – Training Agents Report Financial Analysis Tool
4. Discussion – Individual Training Account Policy
5. Discussion – Training Provider Subsequent Eligibility Policy

South Florida Workforce Investment Board is an equal opportunity employer/program. Auxiliary aids and services are available upon request to individuals with disabilities.



2.

SFWIB - Economic Development and Industry Sector Subcommittee

November 18, 2010

Minutes of SFWIB Economic Development and Industry Sector Subcommittee Meeting May 24, 2010

South Florida Workforce Investment Board
 Economic Development and Industry Sector Subcommittee
 May 24, 2010, 2:00 P.M.
 Doubletree Miami Mart/Airport Hotel and Exhibition Center
 711 NW 72nd Avenue
 Miami, Florida 33126

COMMITTEE MEMBERS IN ATTENDANCE	CONFERENCE CALL ATTENDEES	OTHER ATTENDEES
1. Arboleda, Carlos – <i>Chair</i> 2. Ludwig, Philipp 3. Roth, Thomas 4. Wiedman, Holly	Ketterman, Max McNeely, John	Mare, Fanny – <i>Advance Technical Centers</i>
COMMITTEE MEMBERS NOT IN ATTENDANCE 5. Brecheisen, Bruce 6. Diggs, Bill 7. Harder, Jackie, <i>Vice Chair</i> 8. Russo, Monica	SFW STAFF Beasley, Rick Edwards, Phillip Gomez, Maria Jean-Baptiste, Antoinette Quinones, Dulce	

Agenda items are displayed in the order they were discussed.

1. Call to Order and Introductions

Mr. Carlos Arboleda, Subcommittee Chairperson greeted all those present and began with introductions.

2. Informational – Role and Responsibilities of EDIS Subcommittee

Mr. Beasley discussed the item and mentioned that on April 15, 2010, SFWIB approved the creation of an EDIS subcommittee to be charged with reviewing the Training Vendor Performance Chargeback Policy, Standardized Refund Policy and the Training Vendor Performance Reporting Requirements. Eight members have been assigned to this subcommittee by the Board Chairman and they are: Carlos Arboleda, Subcommittee Chairman, Jackie Harder, Bruce Brecheisen, Bill Diggs, Phillip Ludwig, Thomas Roth, Monica Russo and Holly Wiedman. The three policy subject matter experts are: Max Ketterman, John McNeely and Mike Lynch.

3. Informational – Overview of Statutory and Regulatory Provisions Governing Training

Mr. Beasley presented the item and went over the following regulations:

- 663.410- What is an Individual Training Account?
- 663.420- Can the duration and amount of ITA's be limited?

- 663.440 – What are the requirements for consumer choice?

Mr. Ludwig inquired about the selection process. Mr. Beasley clarified that participants are allowed to choose any eligible service provider that is on the approved list. The list contains providers that have been approved by the Board.

Mr. Ludwig commented on the due diligence. SFW staff member, Dulce Quinones, responded to Mr. Ludwig's comment saying that financial reviews are conducted on all respective providers and they have to meet the following two requirements:

1. Must be in business for at least 2 years
2. Financially Stable: Although ITA's do not have to meet the 20% requirement, their financial statements are reviewed by SFW staff to include the following:
 - a. Balance Sheets
 - b. Trial Balance
 - c. Income Statement
 - d. Bank Reconciliation
 - e. Payables
 - f. Personnel Files
 - g. Authorized Signature Verification
 - h. Insurance Verification

In addition, an on-site review is conducted.

Mr. Arboleda wanted to recap what was discussed thus far:

- The board has the authority to make the final decisions on which vendors/schools are added to the approval list
- SFW staff has the responsibility for the due diligence
- Individuals choose what school they would like to attend from the approved list

Mr. Arboleda asked how often SFW is audited. Mr. Beasley responded that the State reviews our performance data annually.

Mr. Ludwig inquired about additional requirements. Ms. Quinones responded SFW also reviews the provider's legal part to ensure their dues are paid, insurance is current, and there are enough funds in the bank (at least 3 months of financial data is requested).

Mr. Roth inquired about Section 122 not having enough stipulations. Mr. Beasley noted that there's no set ratio.

Mr. Beasley discussed the accredited and non accredited schools.

Mr. Ketterman noted that all non public schools offering training that is vocational in nature must be licensed by the Commission for Independent Education unless they are specifically outside the jurisdiction in the statute. He further explained about the 12 standards and accreditation and said that licensing comes before accreditation and the 12 standards must be met in order to receive a license.

Mr. Roth asked if there's a reason why a school would not want to be accredited. Mr. Ketterman responded saying, accreditation requires a minimum of \$5,000 a year, additional staff to oversee the accreditation, and accreditation is more suitable for larger institutions.

Mr. Arboleda inquired about the percentage of vendors that are not accredited. SFW staff member Maria Gomez responded saying it's roughly about 10%.

Mr. Ketterman mentioned the following regarding the overall percentages of accredited schools:

- Schools offering non degree programs – 40%
- Schools offering degree programs (Associates and higher) – 90%

Mr. Arboleda requested an action item for follow-up to look at the 10% and find out (1) what is the exact percentage; (2) if the current percentage is lower than average.

Mr. Beasley went on to discuss regulation # 663.510 that provides a list of requirements from the Board:

1. Accept applications for initial eligibility from certain postsecondary institutions and entities providing apprenticeship training;
2. Carry out procedures prescribed by the Governor to assist in determining the initial eligibility of other providers;
3. Carry out procedures prescribed by the Governor to assist in determining the subsequent eligibility of all providers;
4. Compile a local list of eligible providers, collect the performance and cost information and any other required information relating to providers;
5. Submit the local list and information to the designated State agency;
6. Ensure the dissemination and appropriate use of the State list through the local One-Stop system;
7. Consult with the designated State agency in cases where termination of an eligible provider is contemplated because inaccurate information has been provided; and
8. Work with the designated State agency in cases where the termination of an eligible provider is contemplated because of violations of the Act.

4. Discussion – SFWIB Standardized Refund Policy

Mr. Beasley presented the item. He mentioned that staff met with training providers on four occasions to come up with a policy and Mr. Perez chaired the meetings and went over the Standardized Refund Policy.

Ms. Gomez gave an example of the current refund policy. She said there's no uniformity, nor does it provide a set turnaround time for refunds.

Mr. Arboleda inquired about SAMS and Ms. Gomez explained that "SAMS is a management system that manages every dollar that goes to the participants."

Mr. Arboleda went on to ask if the new policy has been implemented, or is it currently in draft. Mr. Beasley said it's currently in draft stage.

Mr. Ludwig gave his comments regarding the vendor input and Mr. Arboleda agreed that staff should highlight the fact that the vendor's input was part of this as well.

Max Ketterman mentioned the policy is very similar to the one Commission for Independent Education imposes on all institutions. In addition, he explained how pro rata makes a lot more sense.

Mr. Roth asked how much has been refunded and Ms. Gomez replied, \$245,000. He went on to ask if this new policy becomes effective, how much more would be reimbursed. Ms. Gomez responded, more due to better monitoring.

Ms. Wiedman inquired about the next step since this committee doesn't have a quorum. Mr. Arboleda said that we will make a recommendation to the EDIS Committee.

Mr. Ludwig asked what was the total amount budgeted and how much was spent. Mr. Beasley responded \$6 million and roughly about \$3 million was spent.

5. Discussion – SFWIB Training Vendor Performance Reporting Requirements

Mr. Beasley presented the item and discussed the following:

- Section 122 (d)(1)(a)
 - In order for a training provider to be considered eligible to receive federal dollars, it must submit verifiable program-specific performance information consisting the following:
 1. The program completion rates for all individuals participating in the applicable program conducted by the provider;
 2. The percentage of all individuals participating in the applicable program who obtain unsubsidized employment in an occupation related to the program conducted;
 3. The wages at placement in employment of all individuals participating in the applicable program
- Section 663.565
 - A training provider must deliver results and provide accurate information in order to retain its status as an eligible training provider
- SFWIB's current Individual Training Account (ITA) Performance reporting policy requires each training vendor to satisfy a 70% entered employment rate as well as 70% percent training related placement rate.

[Ms. Weidman left]

- Commission for Independent Education has a placement rate of 60% and completion rate of 50%

Mr. Arboleda commented that there's very little to review in this item since everything is "black & white." However, if other options need to be created, then staff will review and bring back to this committee for consideration.

Mr. Roth recommended soliciting criteria from a few other successful regions and measure criteria.

Mr. Arboleda requested to get provider's feedback, staff recommendation and table the item, but address this later on. He also wants items 5 & 6 be brought back similar to items 2 - 4 with regards to having more background information, suggestions and options for more open discussions.

6. Discussion – SFWIB Training Vendor Performance Chargeback Policy

Mr. Beasley discussed the item and went over the options available to training vendors to meet percentage chargeback requirements.

Mr. Arboleda suggested having a combined payment and refund policy. Mr. Beasley agreed and mentioned a payment system.

Arboleda also suggested that we study it and see what other boards are doing, but meanwhile table this item.

Mr. Ketterman mentioned about a placement improvement plan and recommended to drop and not delay the payment. However, Mr. Ludwig commented that it would make matters worse.

Mr. Arboleda concluded that he didn't feel there was enough information provided in order to make any recommendations.

Mr. Roth inquired about minutes; however, Mr. Beasley responded there may not be any since the meetings were not public.

Mr. Arboleda mentioned the following action items prior to adjourning the meeting:

- All future meetings kept to a maximum of one hour and thirty minutes.
- Reporting requirements and chargeback policy (item #s 5 & 6) requires more detailed homework

Meeting was adjourned at 3:57 P.M.



3.

SFWIB – Economic Development & Industry Sector (EDIS) Subcommittee

November 18, 2010

Training Agents Report Financial Analysis Tool

Information Item

BACKGROUND

To improve the tracking of participants’ performance data, SFWIB staff designed a Training Agents Report Financial Analysis tool. The tool is real-time, updated as information is inputted by the Service Providers and Training Vendors in the Service Account Management System and Employ Florida Marketplace. The goal of the tool is to function as an “ITA Consumer Report Card,” enabling the consumer as well as the public to check on the success of individual programs and to evaluate the economic benefit per placement per program. As it stands, the tool tracks the following:

- 1) Outcome;
- 2) Completion;
- 3) Placement;
- 4) Percent of placements;
- 5) Training-related placement;
- 6) Percent of total training-related placement;
- 7) Training expenditures; and
- 8) Economic benefit per placement.

The Training Agents Report Financial Analysis tool represents SFWIB’s efforts to improve transparency and accountability in the delivery of training services.



4.

SFWIB - Economic Development & Industry Sector (EDIS) Subcommittee

November 18, 2010

Individual Training Account Policy

Discussion Item

BACKGROUND

In partnership with the Training Vendors, SFWIB staff drafted the attached Individual Training Account (ITA) Policy. Staff met with the Training Vendors to gain input from them on the ITA Policy. Thereafter, staff incorporated the Vendors' suggestions into the policy.

The purpose of the ITA Policy is to provide all SFWIB stakeholders with clear, uniform guidelines regarding the application of training funds to pay for approved training programs and to determine subsequent program eligibility. The Policy has two principal benefits: enhances accountability in ITA expenditures and provides the Board an avenue to petition the State to offer new training programs that best meet the needs of the local business community.

The following is a bulleted list of the critical sections of the Policy:

- Definitions;
- Assessment;
- ITA Fee Structure; and
- Performance Measures.

Note that this policy will be implemented following approval by the SFWIB. However, the tiered maximum ITA amounts listed in Section VII (C) and the Economic Benefit per Placement performance measure seen in Section XII will take effect in the 2011-2012 Program Year.

Attachment

INDIVIDUAL TRAINING ACCOUNT (ITA) POLICY SFWIB PY' 2010-2011

I. Of Interest to

The Individual Training Account (ITA) Policy should be of interest to members of the South Florida Workforce Investment Board (SFWIB), Region 23 (Miami-Dade and Monroe Counties) Career Center contractors (Service Providers), Training Vendors, Region 23 jobseekers, and SFWIB staff.

II. Definitions

- 1) Actual start date: the date that the participant commences classes.
- 2) Approved Training Program: a SFWIB approved area of study linked to an occupation seen on Region 23's current Targeted Occupations List.
- 3) Assessment: the process by which Career Center staff evaluates eligible participants before they enroll in a training program.
- 4) Completion: the participant's attainment of a certificate or degree or competencies needed for a specific job or occupational group at the conclusion of a course of study.
- 5) Economic Benefit per Placement: the return on investment per approved training program for each participant placed.
- 6) ITA (Individual Training Account): the scholarship to pay for enrolling in an approved training program.
- 7) ITA Limit/Maximum ITA Amount: a cap on the amount to be paid for each approved program.
- 8) ITA Voucher: the system-generated instrument used to pay for a training program; for the instrument to be valid, it must have all required signatures, i.e., participant, career advisor and supervisor signatures.
- 9) Occupational Training Area: an approved training program linked to the occupations listed on Region 23's Targeted Occupations List.
- 10) Pell Grant: the federal grant that eligible participants apply for to assist in paying for the costs of a training program.
- 11) Performance measures/standards: a set of federal, state and local standards for determining a Training Vendor's compliance with completion and placement requirements.
- 12) Placement: the number of participants that obtain unsubsidized employment following completion of a training program.
- 13) Remedial Courses: a course taken to prepare for a required course in an approved training program.
- 14) Service Account Management System (SAMS): the system for tracking participants'

training-related information, i.e., expenditures and performance data.

- 15) Targeted Industries: industries determined by the SFWIB as a priority for occupational training; currently, those industries are Aviation, Healthcare Services, Life Sciences/Bio-Tech, Green Jobs, Information Technology and Waste Water Management.
- 16) Targeted Occupations List (TOL): a State-compiled list of occupations that Regional Workforce Boards may offer training in.
- 17) Training-related placement: the number of participants that obtain unsubsidized employment in an occupational area relevant to the training program completed.

III. Subject

Training utilizing Individual Training Accounts (ITAs)

IV. Purpose

The purpose of the ITA Policy is to provide all SFWIB stakeholders with uniform guidelines regarding the use of training funds to pay for approved training programs and to determine subsequent program eligibility.

V. Background

An ITA is the vehicle through which SFWIB expends training dollars. ITAs may be used to pay for or help defray the cost of training at an approved SFWIB Training Vendor. ITAs may also be used to provide training in an occupation clearly linked to a priority industry that is in local demand or that appears on the Region's Targeted Occupations List (TOL). ITAs are available to customers eligible for WIA Adult, Dislocated Worker, Youth and Welfare Transition programs; however, note that an ITA is neither an entitlement nor a right.

VI. Assessment

Career Center staff is required to individually assess eligible participants for training prior to the issuance of an ITA voucher. The assessment process consists of examining a participant's academic and employment background as well as short- and long-term career interests. The intent of this process is to assist the participant in selecting a training program he/she is likely to succeed in and ultimately contribute to the achievement of economic self-sufficiency.

VII. Individual Training Account Fee Structure

A. ITA Cost

By May 15th of a Program Year (PY), Training Vendors are required to submit program cost modifications for the next PY to SFWIB staff. That information is used to update the program cost information seen on the SFWIB website and in SAMS. The maximum ITA amount for each PY is derived from the program cost information submitted by the public education Training Vendors.

Specifically, the ITA limit per public school training program is set at 100% of the public institutions' submitted cost information and 110% of the public institutions' cost information for private institutions' comparable programs. Where there is no comparable **regionally** approved public education institution program, the cost of the approved private Training Vendor's program will be based on occupational title, quadrant category and cost negotiation within the applicable quadrant category.

B. Individual Account Training Cap

The maximum cap for the Individual Training Account (ITA) is **\$10,000.00**.

C. ITA Amount for Occupational Training Areas

The ITA amount for each occupational training area is based on if the occupation is identified as High Wage/High Growth, High Wage/Low Growth, Low Wage/High Growth, and Low Wage/Low Growth.

The maximum ITA amounts are as follows:

- Occupations identified as High Wage/High Growth **up to and including \$10,000.00**
- Occupations identified as High Wage/Low Growth **up to and including \$7,500.00**
- Occupations identified as Low Wage/High Growth **up to and including \$5,000.00**
- Occupations identified as Low Wage/Low Growth **up to and including \$2,500.00**

The formula to determine whether an occupation is high wage/high growth, low/wage growth, etc. is based on the State of Florida LMI data for the fastest growing occupations within Region 23 by growth rate and salary rate. Annually, the average growth rate and average salary rate will be determined for the identified occupations, sorted by growth rate and average salary, and then placed in the appropriate category.

D. ITA Voucher

A voucher will be issued covering up to and including 50 percent of the maximum approved ITA amount. In order for the voucher to be submitted for payment, the actual start date must be entered in SAMS and the participant must attend class for 14 consecutively scheduled classes. The 14-day period begins to run by entering participant information in SAMS, such as actual start date and length of program.

Upon the participant's completion of up to and including 50 percent of the training program, a voucher will be issued for the remaining maximum ITA amount. **Note: The payment of the** remaining amount is contingent on the Training Vendor's submission to the applicable Service Provider of documentation evidencing the participant's attendance records.

All vouchers must be issued within the same Program Year in which service(s) was/were rendered.

Please refer to the SFWIB Performance Reporting Requirements Policy & Procedures for more information.

VIII. Duration of Training for Individual Training Accounts

Individual Training Accounts can only be used to cover the cost of **up to and including** one year of training. This is a lifetime limit.

Exception: Those programs that the SFWIB have identified as targeted industries are exempt from the one-year limitation.

If the SFWIB participant's training cost is covered by another funding source, for example, Pell Grants or scholarships, of the maximum ITA amount approved only **up to and including** \$2,000 may be issued via voucher to offset the costs of books, certification examination/testing fees, etc., for **up to and including** one year of training. Note that this \$2,000 sum is not separate from the approved maximum ITA amount.

SFWIB participants that elect a training program that is more than one year in length, i.e., an Associate in Science (A.S. Degree) program, will be responsible for all training costs beyond the one year covered by the ITA.

Associate of Arts (A.A. Degree) and Bachelor Degree programs are not covered by ITAs.

IX. Financial Aid

A. Pell Grants

All SFWIB participants requesting training using an ITA are required to apply for the Pell Grant (Title IV) by completing the Free Application for Federal Student Aid (FAFSA).

SFWIB participants pending PELL Grant approval/award may be enrolled in training through an ITA voucher. If subsequently awarded, the Pell Grant proceeds will be applied toward the tuition costs, with the ITA paying only for costs in excess of the Pell award. In the case that the Pell award covers the cost of the training, the Training Vendor will reimburse SFWIB the amount of tuition paid by SFWIB.

B. Other Financial Aid/Student Loans

If a SFWIB participant has another grant or scholarship, the ITA funds will be available only after the other grant or scholarship has been utilized.

SFWIB participants that elect to attend training programs may be required to obtain student loans and/or other grants to cover the cost of the program that they wish to enroll in if the ITA amount and the Pell Grant, if eligible for Pell, do not cover the full cost of the program. If the SFWIB participant is not Pell eligible, or the school or program is not Title IV eligible, the SFWIB participant will be required to obtain student loans and/or other financial aid to cover the cost of the program not covered by the ITA amount. SFWIB will not be responsible for any debts that a SFWIB participant incurs.

X. Limitations

- 1) Only one training program per SFWIB participant can be paid through the ITA; participants are limited to one lifetime ITA.
- 2) The SFWIB participant must enroll in school half-time or full-time as defined by the Training Vendor.

- 3) The ITA can only be used for courses that are specifically required for the program of study.
- 4) SFWIB will only pay once for each required class in an approved training program. SFWIB will not pay for re-takes. This one-time payment includes remedial courses.
- 5) SFWIB will only pay once for each required certification examination.
- 6) In the case of those occupational training areas where the State licensing and/or certification examinations are offered only in the English language, SFWIB participants enrolled in such training shall be taught in English.
- 7) Associate of Arts (A.A. Degree) and Bachelor Degree programs are not covered by the Individual Training Account.

XI. Service Account Management System (SAMS)

Approved SFWIB Training Vendors shall utilize the SFWIB SAMS Training Vendor screen to submit information on training status (drop, withdrawals, Pell information, etc.), attendance, training progress, placement, credential attainment information and performance information on a regular basis. The Training Vendor will provide credential information to the Service Provider and any follow-up data required.

Service Provider case managers shall track SFWIB participants' training performance through SAMS.

Please refer to the SFWIB Performance Reporting Requirements Policy & Procedures for more information on the responsibilities of Training Vendors and Service Providers relevant to SAMS data reconciliation.

XII. Performance Measures

Training Vendors that agree to accept ITAs from SFWIB will be required to meet SFWIB performance standards. The table below lays out the performance measures.

Performance Measure	Performance Standard
Completion Rate	70%
Placement After Training	70%
Training-Related Placement	75%
Economic Benefit Per Placement	Quadrant Benchmark
Low Growth / Low Wage	\$14,785
High Growth / Low Wage	\$12,493
Low Growth / High Wage	\$31,542
High Growth / High Wage	\$29,201

A. Completion Rate

This measure examines the percentage of participants who successfully complete training in an approved SFWIB program.

B. Placement after Training

This measure examines those SFWIB participants who completed training and have been placed in unsubsidized employment within **180** days of training completion.

C. Training-Related Placements

This measure examines those SFWIB participants who completed training and obtained unsubsidized employment within **180** days of completion in a training-related occupation.

D. Economic Benefit per Placement

This measure examines the percentage of the return on investment per approved training program for each participant placed. **The approved program must meet and/or exceed the standard economic benefit per placement by quadrant.**

E. Subsequent Eligibility

For an approved training program to be considered for renewal, the program must meet or exceed each performance measure. Programs neither meeting nor exceeding each measure will be removed from SFWIB's approved offerings list. For a removed program to return to the approved offerings list, that program must be resubmitted for a programmatic review and Board-approval a year from the date of removal.

XIII. Roles and Responsibilities

Training Vendors and Service Providers are required to input data relevant to each of the above measures into SAMS. Additionally, Vendors and Providers are required to input wage data per placement into SAMS. Note that supporting documentation for each system entry must be readily available for review. Please refer to the SFWIB Performance Reporting Requirements Policy and Procedures for more information.



5.

SFWIB - Economic Development & Industry Sector (EDIS) Subcommittee

November 18, 2010

Training Provider Subsequent Eligibility Policy

Discussion Item

BACKGROUND

The Workforce Investment Act of 1998, Section 122 requires Training Providers to submit verifiable program-specific information so that the Local Board can determine the subsequent eligibility of approved training programs. The program-specific information consists of the following:

1. the program completion rates for all individuals participating in the applicable program conducted by the provider;
2. the percentage of all individuals participating in the applicable program who obtain unsubsidized employment, which may also include information specifying the percentage of the individuals who obtain unsubsidized employment in an occupation related to the program conducted;
3. the wages at placement in employment of all individuals participating in the applicable program; and
4. the rates of licensure or certification, attainment of academic degrees or equivalents, or attainment of other measures of skills, of the graduates of the applicable program.

The attached draft policy details SFWIB's approach to determining the subsequent eligibility of an approved training program.

Attachment

TITLE:

Training Provider Subsequent Eligibility Policy

PURPOSE:

To provide South Florida Workforce Investment Board (SFWIB) stakeholders with guidance regarding the determination of the eligibility of a Training Provider to continue to receive funds for a program after an initial period of eligibility.

STATUTORY SOURCE:

Workforce Investment Act of 1998, Section 122 (c) Subsequent Eligibility Determination and Section 122 (d) Performance and Cost Information.

The SFWIB has been chartered by the State of Florida to craft and oversee a workforce development system that is responsive to the needs and concerns of both employers and jobseekers in Miami-Dade and Monroe Counties. SFWIB acts as the administrative entity for implementation of several federal and state-funded programs including the Workforce Investment Act of 1998 (WIA), Workforce Innovation Act of 2000 and the Welfare Transition Program. Using these funds, SFWIB contracts with other entities to provide employment and training services.

POLICY:**Reconciliation**

Each SFWIB Training Provider must submit **monthly** training performance data for each approved program of study in order to continue receiving Individual Training Account vouchers. The data must be reconciled with training performance data gathered by Career Center Service Providers, thereby eliminating all identified discrepancies. SFWIB staff matches the training performance data to the state unemployment insurance wage records, when available, or to Employ Florida Marketplace (EFM) and to documentation found in the participant's Career Center file or at the Training Provider's facility.

SFWIB's Office of Continuous Improvement will conduct data validation of the performance levels reported by the Training Provider. Upon completion of data validation, Office of Continuous Improvement (OCI) staff prepares a report that details all findings and requests a response in the form of a corrective action plan from the Training Provider within twenty (20) business days. Upon receipt of the corrective action plan, the SFWIB OCI Supervisor has thirty (30) days to review and render a decision regarding the Training Provider's corrective action plan. SFWIB OCI staff also conducts a follow-up review to determine whether the approved corrective action plan was implemented by the Training Provider and whether the identified findings were remedied.

Training Providers must submit a Reconciliation Report to SFWIB by the 10th of each month. The Reconciliation Report must include the following:

1. The completion rates for all individuals participating in the applicable program conducted by the Training Provider;
2. The percentage of all individuals participating in the applicable program who obtain unsubsidized employment within 180 days from graduation;
3. The percentage of all individuals participating in the applicable program who obtain unsubsidized employment in an occupation related to the program conducted within 180 days from graduation;
4. The wages at placement in employment of all individuals participating in the applicable program; and
5. The rates of licensure or certification, attainment of academic degrees or equivalents, or attainment of other measures of skills such as industry-recognized occupational skills, of the graduates of the applicable program.

The goal of the reconciliation process is to improve the credibility of the data entered into the applicable management information system.

Performance Measures

All Training Provider Agreements will require Training Providers to satisfy the following performance measures:

Performance Measure	Standard
Completion Rate	70%
Placement After Training	70%
Training-Related Placement	75%
Economic Benefit Per Placement	Quadrant Benchmark
Low Growth / Low Wage	\$14,785
High Growth / Low Wage	\$12,493
Low Growth / High Wage	\$31,542
High Growth / High Wage	\$29,201

1. *Completion Rate* - This measure examines the percentage of participants who successfully complete training in an approved SFWIB program.
2. *Placement after Training* - This measure examines those SFWIB participants who completed training and have been placed in unsubsidized employment within **180** days of training completion.
3. *Training-Related Placements* - This measure examines those SFWIB participants who completed training and obtained unsubsidized employment within **180** days of completion in a training-related occupation.

4. *Economic Benefit per Placement* - This measure examines the percentage of the return on investment per approved training program for each participant placed. The quadrant benchmarks will be revised on an annual basis.

Subsequent Eligibility

An annual performance evaluation will be conducted to determine whether each Training Provider's approved program met SFWIB's performance standards during a Program Year (PY), July 1st to June 31st. In January of each year, OCI will commence its review of submitted performance data to determine program eligibility for the next program year. The population for the evaluation is participants who received Individual Training Account vouchers who completed course/program requirements or were dropped from a course/program during the evaluation period.

For an approved training program to be considered for renewal, the program must meet or exceed each performance measure as determined by OCI during the annual performance evaluation. Programs neither meeting nor exceeding each measure will be removed from SFWIB's approved offerings list at the beginning of the next PY.

For a removed program to return to the approved offerings list, that program must be resubmitted for a programmatic review and Board-approval a year from the date of removal.