



MICHIGAN DEPARTMENT OF
**LABOR & ECONOMIC
OPPORTUNITY**

**WORKFORCE
DEVELOPMENT**

OFFICIAL

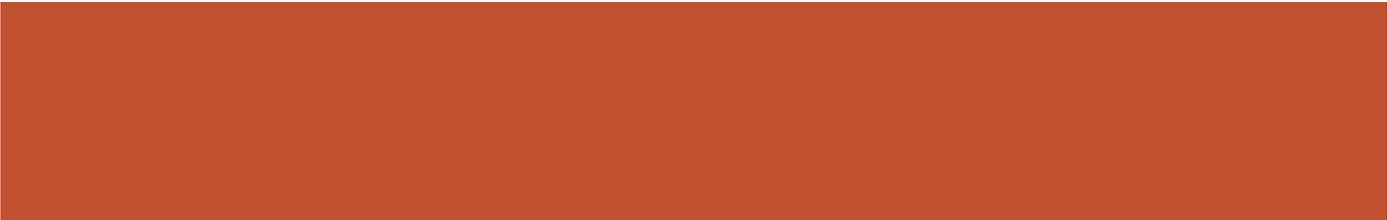
Michigan Training Connect (MiTC)

Policy Manual

Requirements and Guidelines

Prepared By:

Talent Development Division



Preface

The Workforce Innovation and Opportunity Act (WIOA) was signed into law on July 22, 2014. The WIOA presents an extraordinary opportunity to improve job and career options for our nation's workers and job seekers through an integrated, job-driven public workforce system that links diverse talent to businesses through continuous improvement supported through evaluation, accountability, identification of best practices, and data-driven decision-making.

The workforce system and its regulations established under the WIOA emphasizes allowable types of training, including both work-based and classroom instruction, with the goal of ensuring informed consumer choice, job-driven training, provider performance, cost-effective investment of public funds, and continuous improvement. Goals and priorities for Michigan include investing in the closure of equity gaps, removing barriers to employment, building equitable pathways to high-wage careers, and growing skills/credentials to meet employer needs and contribute to Governor Whitmer's Sixty by 30 mission. The quality and selection of providers and programs of training services is vital to achieving these core principles. As required by the WIOA Section 122 and 20 Code of Federal Regulations (CFR) part 680, states in partnership with Local Boards must identify eligible training providers and programs that are qualified to receive WIOA Title I-B funds to train adults and dislocated workers, including those with disabilities. The approved State list of eligible training providers and programs serves as an important tool for participants seeking training providers and programs, and relevant information, such as program cost and program outcomes.

WIOA Section 122(c) specifies that states must establish an application procedure for training providers and programs to maintain their eligibility and the eligibility of their programs. States in partnership with the local boards, the One-Stop system, and its partners play a leadership role in ensuring the success of the eligible training provider system. The Michigan Training Connect (MiTC) serves as an important tool for participants seeking training to identify appropriate providers and relevant information such as cost and program outcomes. Using the MiTC, career planners can assist participants in identifying training providers offering programs in high-demand industries that result in positive outcomes and recognized credentials.

Using and Maintaining the MiTC Policy Manual

Information identified as required for placement on the MiTC is necessary for initial and continued eligibility determination, for program management purposes, and the collection of information for performance and for federal reporting purposes.

References

References used in development of the manual include the following:

- [The Workforce Innovation and Opportunity Act](#) (WIOA) of 2014, (Public Law 113-128 Title I [29 United States Code Section 3101, *et. seq.*]).
- [The WIOA Final Rules and Regulations](#), as published in the Federal Register on August 19, 2016.
- [Michigan Act 148, Public Acts of 1943](#), as amended.

- U.S. Department of Labor (USDOL) Training and Employment Guidance Letter ([TEGL 7-16](#), “Data Matching to Facilitate WIOA Performance Reporting,” issued August 21, 2016.
- USDOL [TEGL 10-16, Change 1](#), “Performance Accountability Guidance for WIOA Title I, Title II, Title III, and Title IV Core Programs,” issued August 23, 2017.
- USDOL [TEGL 13-16](#), “Guidance on Registered Apprenticeship Provisions and Opportunities in the WIOA,” issued January 12, 2017.
- USDOL [TEGL 19-16](#), “Guidance on Services provided through the Adult and Dislocated Worker Programs under the WIOA and the Wagner-Peyser Act Employment Service (ES), as amended by Title III of the WIOA, and for Implementation of the WIOA Final Rules,” issued March 1, 2017.
- USDOL [TEGL 26-16](#), “Guidance on the Supplemental Wage Information to Implement the Performance Accountability Requirements under the WIOA,” issued June 1, 2017.
- USDOL [TEGL 3-18](#), “Eligible Training Provider Reporting Guidance under the WIOA,” issued August 31, 2018.
- USDOL [TEGL 8-19](#), “WIOA Title I Training Provider Eligibility and State List of Eligible Training Providers (ETPs) and Programs,” issued January 2, 2020. (Includes Attachment III – *ETP Eligibility Policy Checklist Tool*)
- USDOL Training and Employment Notice ([TEN 24-19](#), “To announce the intent to publish the Employment and Training Administration (ETA)-9171 ETP Performance Report results submitted October 1, 2020 to the Training Provider Results website.”
- USDOL [TEN 8-20](#), “Public Workforce System Role in Reopening State and Local Economies,” issued December 10, 2020.
- USDOL [TEN 9-20](#), “Availability of Training Provider Results Website,” issued December 15, 2020.

A text version of the WIOA, applicable TEGs, Fact Sheets, and Notices of Proposed Rulemaking may be found on the [USDOL website](#).

Revised and/or additional chapters, sections, and pages will be issued as necessary. Pages are numbered sequentially **within** each chapter.

The manual should be kept at hand electronically or in a loose-leaf notebook or binder so that changes, additions, and deletions can easily be made.

Dates noted as "date issued" and "supersedes" refer to issuances of this manual and are not effective dates of regulations, policies, and income levels.

Notes

1. The MiTC only includes Individual Training Account (ITA)-eligible training providers. Individuals looking for non-eligible ITA programs or programs choosing not to accept ITA-funded students may search for additional schools listed on [Pathfinder](#). Pathfinder is Michigan's state-of-the-art, online, career path exploration tool that allows students and job seekers to better match their skills and interests to career paths and jobs.
2. Questions concerning state or federal policy should be directed to your local WIOA State Coordinator. Questions concerning the MiTC operations, the status of MiTC applications, and processes should be submitted to LEO-MiTC@Michigan.gov.
3. The Department of Labor and Economic Opportunity's Michigan State Approving Agency approves education/training facilities and related programs for Veterans throughout the State. These approvals enable the utilization of GI Bill® educational benefits at Michigan's educational and training facilities.

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Chapter 1: Overview and General Posting Information

Section 1-1: General Requirements for All Training Programs

The public workforce system plays a vital role in furthering access to credentials through its relationship with employers, labor, and industry organizations. Increasing credential attainment requires aligning state and local policies and service delivery models that support higher enrollments in credential-issuing training programs. As part of a demand-driven system, close coordination with local employers and training providers is required to identify and develop industry-recognized credentials for local, in-demand jobs. Attributes of career-enhancing credentials include industry recognition, stack-ability, portability, and accreditation.

Section 1-2: Training as Part of a Demand-Driven Strategy

As a demand-driven workforce system is Michigan's primary workforce development strategy, the Michigan Works! Agencies (MWAs), in consultation/collaboration with local employers, must ensure that training programs posted on the State's Eligible Training Provider (ETP) List/Michigan Training Connect (MiTC) are related to in-demand occupations.

Training must lead to an in-demand occupation, as defined by the local workforce development board, and be completed within time limits established by the board. The selection of a program of training services must be directly linked to employment opportunities either in the local area or in another area to which the individual is willing to relocate. Each MWA should determine which in-demand occupations to invest their Workforce Innovation and Opportunity Act (WIOA) training dollars, based on their local/regional economy and the MWA's in-demand occupations list.

Section 1-3: Dissemination of the List of ETPs

The WIOA requires that state agencies disseminate their lists of ETPs, including the dissemination of information about Registered Apprenticeships. The lists must include accompanying performance and cost information. These lists must be disseminated to the local boards in the state, members of the public, the One-Stop delivery system and its program partners, and the state's secondary and postsecondary education systems via online methods such as through websites, searchable databases, and other means the state uses to disseminate information to consumers, the One-Stop delivery system, and program partners throughout the state. The U.S. Department of Labor Employment and Training Administration will continue to maintain lists of states' ETPs on the [Career One-Stop website](#).

Section 1-4: Developing and Disseminating the List of ETPs - Role of the State

The state agency has explicit responsibility for managing and disseminating the list of ETPs. The state must perform the following required roles:

- Establishing eligibility procedures and clarifying state and local board roles and responsibilities.
- Establishing a mechanism for adding Registered Apprenticeship programs to the MiTC and verifying registered status.
- Consulting with the State Board when establishing these procedures.

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- Providing an opportunity for interested members of the public to make recommendations and submit comments regarding the eligibility procedure including local boards.
- Determining whether the provider submitted accurate information; and taking enforcement actions as needed.
- Disseminating the list to the local boards, the One-Stop system, its partner programs, and the public.
- Determining if the state-established minimum performance levels for eligibility are met.
- Removing programs that do not meet state-established program criteria or performance levels for eligibility.
- Establishing an appeals procedure for providers to appeal a denial of eligibility. Please see the Workforce Development ([WD](#)) [Grievance and Complaint Policy](#).

Section 1-5: Developing and Disseminating the List of ETPs - Role of the Local Areas

Local boards have statutorily required responsibilities related to ETPs, roles assigned by the Governor, and additional options for their local area.

- Per Training and Employment Guidance Letter (TEGL) 08-19, local boards must work with the state to ensure that:
 - There are sufficient numbers and types of providers of training services (including eligible providers with expertise in assisting individuals with disabilities and eligible providers with expertise in assisting adults in need of adult education and literacy activities) serving the local area and providing services that maximize consumer choice and lead to competitive integrated employment for individuals with disabilities; and
 - Public dissemination of the MiTC through the local One-Stop system, including in formats accessible to individuals with disabilities, and its partner programs.
- Specific responsibilities such as:
 - Determining the initial eligibility of training providers; including a review that the training is linked to high-demand employment opportunities and that training leads to an industry-recognized credential or certification.
 - Renewing eligibility of training providers; including a review that training is linked to high-demand employment opportunities and that the training leads to an industry-recognized credential or certification.
 - Identifying a provider's substantial violation of the WIOA; providers who *substantially violate the requirement to timely and accurately submit all required information must be removed from the ETP list per TEGL 08-19, Attachment II, and per 20 Code of Federal Regulations (CFR) 680.460(l)(2).

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*Substantial violation of the requirement to “timely and accurately submit all required information for performance and eligibility purposes” is defined as:

- Eligibility Criteria: Allows a training provider 30 days to respond to any request(s) for required information. If the provider does not respond within the 30-day timeframe, they will be required to resubmit their training program application if they wish to have their training program placed on the MiTC.
 - Performance Data: Both initial and continuing eligibility performance data is based on a Program Year (PY), operating from July 1 through June 30 each year. The MiTC system sends automated reminder emails to providers within a two (2) month, one (1) month, two (2) week and one (1) day period *before* July 1st when the renewal period starts. The performance data is submitted by each training provider and wage data match is performed at the State level. A training program is removed from the system if they do not submit performance data within the required timeframe by July 31st of each year.
- Local boards must remove ETPs that fail to meet local performance standards (if applicable) from the local ETP list, in accordance with state and local policies and procedures. This process must allow for appeals in accordance with the state’s appeals procedure for providers of training to appeal a denial of eligibility from the local list of eligible training providers. [680.480(e) 683.630(b)]
 - The local board may set additional eligibility criteria, information requirements, and higher performance levels for local providers beyond what is required by the state. Any additional requirements established by the local board will only affect a program’s eligibility and performance level eligibility requirements within the local area.
 - Local boards may provide recommendations and input regarding the development of the State’s ETP procedure through the public comment process.
 - Local boards must complete other responsibilities delegated to the local boards by the State. The Michigan Department of Labor and Economic Opportunity, Workforce Development (LEO-WD) has delegated its approval authority to the MWAs. In all cases where the program is passed on to the MWA for review and approval, it is the responsibility of the MWA to verify that the credentials are valid (associate or baccalaureate degree, occupational licensure, occupational certificate, occupational certification or licensure, or other industry-recognized certificates of industry/occupational skills completion sufficient to qualify for entry-level or advancement in employment) and that the training program is in high-demand and will meet employer needs within the local area.

Section 1-6: Overview of MiTC Requirements

A “program of training services” is one or more courses or classes, or a structured regimen that leads to:

1. A recognized postsecondary credential,

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2. An industry-recognized certificate or certification, a certificate of completion of an apprenticeship, a license recognized by the state involved or the federal government,
3. Employment, or
4. Measurable skill gains toward such a credential or employment.

Section 680.410(d) of the WIOA regulations defines an ETP as the only type of entity that receives funding for training services as defined in Section 680.200 through an Individual Training Account (ITA). The entity must be one of the following types:

- An institution of higher education that provides a program that leads to a postsecondary credential (Associate or a Baccalaureate degree),
- An entity that carries out programs registered under the National Apprenticeship Act (29 United States Code 50 *et seq.*), or
- Other public or private providers of training services which may include:
 - A private non-profit provider, such as a community-based organization.
 - A private for-profit provider, such as a proprietary school.
 - A joint labor management organization.
 - Eligible providers of adult education and literacy activities under Title II of the WIOA if such activities are provided in combination with career services described at 20 CFR 680.350.

A “site” is defined as a place at which an instructional or training program is delivered. A “site” is administered independently and maintains administrative records specific to enrollment in its program(s) of study.

Section 1-7: Required MiTC Information for Schools Pursuing ITA Eligibility

Required MiTC contact and program-specific information includes the following:

- The name of the school or institution/organization to provide training services to WIOA Adult and Dislocated Worker program participants.
- The program contact, including the name, phone number, and address of the training provider’s main location, including city, state, and five-digit zip code. Use the [U.S. Postal Service address validation system](#) to verify the address and zip code.
- The training program title.
- A short description of the training program. The description can include other course prerequisites (e.g., driver’s license or work experience, learning outcomes, competencies gained, program accreditation, full-time/part-time, required books/technology, and related careers).

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- The program website or the URL of the training program-specific web page for training seekers to find more information on the program. If the program-specific page is not available, the URL of a list of programs is acceptable, or the URL for the school's web page is acceptable.
- The program of study by potential outcome, i.e., the credentials¹ earned upon completion. Credentials include:
 - Industry-recognized occupational certificate or certification, appropriate to qualify for entry-level or advancement in employment.
 - Certificate of completion of an apprenticeship, and/or career and technical educational certificates.
 - Occupational license recognized by the state involved or the federal government.
 - An associate degree.
 - A program of study leading to a baccalaureate degree.
 - Community college certificate of completion.
- The specific name of the associated credential. The associated credential is identified as the specific name of the certificate, certification, license, or degree participants can receive, i.e., Certified Welding Inspector.
- The two-digit [Classification of Instructional Programs \(CIP\) General Category Code](#).
- The four-digit CIP Detailed Category Code.
- The six-digit CIP Program Code.
- Information concerning whether a provider is in a partnership with a business.
- O*Net-Standard Occupational Classification (SOC) code for which the program prepares students. The choices offered will be from the National [CIP to SOC crosswalk](#). Up to three SOC codes can be chosen, one is mandatory.
- The total out-of-pocket costs, including the total cost of tuition and required fees, assuming normal time to completion. Examples of fees include athletic center fees, technology fees, and lab fees.

Note: Per WIOA federal regulation Sections 680.460, 680.480, 680.490 and State requirements, a training provider must meet requirements for eligibility and provide accurate information in order to obtain and retain status as an eligible training provider. This includes

¹ Note: WIOA Section 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. Effective July 1, 2018, graduate degrees are not included in the definition of a recognized postsecondary credential. Therefore, graduate degrees do not count towards credential attainment under WIOA Title I. Under very limited circumstances and at their individual discretion, MWAs may still pay for a master's degree or graduate training programs using other methods of payment (other than WIOA Title I funds); but Master level programs will not be listed on the MiTC and training will not count towards the credential attainment rate.

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accurate cost information posted on the MiTC, and that WIOA Individual Training Account (ITA) students **must not be charged at a different (*higher*) rate** than non-ITA students.

- The total cost of other out-of-pocket costs of books and supplies, assuming normal time to completion.
- Whether or not there is a license fee for employment.
- If any additional sources of financial assistance, including Pell Grants or other sources of financial assistance, are accepted.
- A description of any other sources of financial assistance that are accepted.
- Estimated waiting period for entry into the program.
- Program duration (clock or contact hours). Clock hours are the total number of actual hours per week a student spends attending class or other instructional activities that count toward completing a program of study. A clock/contact hour is defined as a 60-minute span of time with between 50 and 60 minutes of actual class instruction, which may include class, recitation, lecture, lab, training, or internship. No more than one (1.0) clock hour can be assigned to any discrete 60-minute period.
- Program duration (weeks) as completed by a full-time student.
- Program prerequisites. Prerequisites may include:
 - High school diploma or its equivalent.
 - Associates degree.
 - Bachelor's degree.
 - Courses.
 - A combination of education and course(s).
- Program Format. The format of the program may include:
 - In-person.
 - Online, e-learning, or distance learning.
 - Hybrid or blended program.
- Whether or not an internship or externship is required.
- Whether or not the program is a new program. A new program is defined as a program that cannot report historical information on outcomes for graduates because the program lacks a history. Conditions include:

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- The first day of the first class has not yet occurred, AND
- The program is a new offering for the institution.
- Required MiTC program performance data. Schools are required to meet minimum performance standards. These minimum standards are based on Michigan's expected performance levels, as negotiated with the U.S. Department of Labor.

Section 1-8: Program Specific Performance - Required Provider Information

All eligible training providers must annually submit accurate and timely performance data and cost information for both initial eligibility and continued eligibility. Performance information is required for all programs of study listed on the MiTC, whether the WIOA participants were enrolled during the reporting period. Training providers must deliver results and provide accurate information in order to retain status as an ETP [20 CFR 680.460(h-l)]. This information is considered when establishing continued eligibility as part of the State's yearly review and renewal of eligibility for the provider.

The program-specific performance information submitted to the State must include all of the following information, disaggregated by the local area being served, as applicable:

- Performance outcome information for the indicators described in the WIOA Section 116(b)(2)(I) - (V).
- Information identifying the recognized postsecondary credentials received by the WIOA participants.
- Program cost information, including tuition and fees for the WIOA participants in the program.
- Information on the program completion rate for the WIOA participants.

Additional performance information that the State determines to be appropriate to determine and maintain eligibility may be required.

If a provider can demonstrate that providing required performance information is unduly burdensome, or costly, and the State (or local MWA) determines that providers have demonstrated such extraordinary costs or undue burden:

- The State must provide access to cost-effective methods for the collection of information.
- The State may provide additional resources to assist providers in the collection of the information from statewide workforce investment activities under the WIOA Sections 128(a) and 133(a)(1), or
- The State may take other steps to assist training providers in collecting and supplying required information such as offering technical assistance.

The WIOA Section 116(d) requires providers to submit performance information for the State's ETP Reports, which are disseminated publicly, similarly to the list of ETPs. Required MiTC program performance data for all individuals (WIOA and non-WIOA participants) includes the following:

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- Median earnings in the second quarter after exit. Median wage is the midpoint between the highest and lowest wage earned in the second quarter after exit. This indicator also includes individuals who are verified to be self-employed.
- Credential attainment rate. This includes individuals enrolled in the program of study who:
 - Attained a recognized postsecondary credential during the program or within one year after exit from the program.
- Average earnings of individuals in the program of study who are in unsubsidized employment during the second quarter after exit.
- Average earnings of individuals in the program of study who are in unsubsidized employment during the fourth quarter after exit.
- The total number of individuals exiting the program of study (or the equivalent).

As of July 1, 2018, both initial and continuing eligibility is based on a PY, operating from July 1 through the following June 30. Additionally, all schools are required to enter their performance data on the MiTC for each program of study at each training site. The information must be reported for all programs of study listed on the MiTC, including programs that have not served WIOA participants during the reporting period.

Beginning with the PY 2018 performance report (submitted October 1, 2019), performance is calculated by WD on behalf of all participating schools. A reporting tool was built into the MiTC to assist schools that were currently not reporting via Center for Educational Performance and Information (CEPI) or other state or federal systems, with submitting student data required to calculate ETP performance. The tool matches student information with Unemployment Insurance wage record data and other supplemental data, as appropriate. The tool was implemented in June 2019.

All performance data must be verifiable and will be subject to audit. Training providers must agree to these terms in order to post their information on the MiTC.

Section 1-9: Individual Training Accounts (ITAs)

The purpose of an ITA is to provide the WIOA-eligible individuals with the means to obtain the necessary training to become gainfully employed or re-employed.

Individuals are determined eligible for training by the local MWAs. Under the WIOA, service categories of core and intensive services are collapsed into “career services,” and there is no required sequence of services, enabling job seekers to access training immediately. Training services are limited to individuals who are unable to obtain other grant assistance beyond the compensation available under other grant assistance programs, which includes, but is not limited to Pell grants, Trade Adjustment Assistance, or other federal grants. Career planning should be informed by local Labor Market Information (LMI).

Per Training and Employment Notice (TEN) 8-20, timely, useful LMI should be utilized. LMI informs both immediate response and on-going recovery efforts during this rapidly changing economic environment. Local areas should incorporate LMI into timely and easily understandable information into career counseling. This means workforce staff must assess customer skills and abilities to determine if

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they match the skills and abilities needed for employment based on jobs and LMI data forecasting. Informed customer choice is critical to finding a suitable match between the employer's needs and the customer's ability to succeed in that role. States and local areas should also use LMI as they consider training to be included in eligible training provider lists. The Bureau of Labor Statistics, state LMI offices, and the ETA-sponsored webpages of CareerOneStop and O*NET all provide current and useful labor market information.

Local boards may supplement the criteria and information requirements in order to support informed consumer choice, other than for registered apprenticeship programs (680.510(b)). This additional information may include:

- Information on programs of training services that are linked to occupations in demand in the local area (680.510(b)(1)).
- Performance and cost information, including program specific performance and cost information, for the local outlet(s) of multi-site eligible training providers (680.510(b)(2)).
- Information that shows how programs are responsive to local requirements (680.510(b)(3)).
- Other appropriate information related to the objectives of WIOA (680.510(b)(4)(III)).

The selection of a training provider is jointly made by both the career planner and participant, considering the likelihood of long-term employment at completion of the training. Approval of an ITA-eligible training provider on the MiTC does not guarantee that students will select the training program or that the MWAs will make referrals.

Consistent with the WIOA Final Rules, Section 680.220(b), the participant's case file must contain a determination of the need for training services as determined through the interview, evaluation, or assessment and career planning informed by local LMI and training provider performance information or through any other career service received.

The training program is required to be listed on the MiTC website at the time of the participant's training start date of the training program and remain on the MiTC with subsequent semester(s) or term(s), with special attention given to **August 1 and after (following the July renewal period)**. The MWA must ensure the training provider is on the MiTC *before* proceeding with the participant training and entering of the training start date in the One-Stop Management Information System (OSMIS). If a training provider is not on MiTC at the training start date, the MWA will be required to ask for a full refund of any expenses that have been paid for the training.

If individuals have not completed training, the intent is not to remove individuals who have started training and are *close to* completion and/or have completed. The MWAs must ensure the training provider is on the MiTC at the training start date and input the end date into OSMIS. If a participant has completed one semester of a two-semester training program where the provider was on the MiTC list at "training start date", but for second semester they are not listed, the appropriate action is to allow the participant to finish training. Local areas must update their ITA policies regarding payment processes to include that no payments will be made to a training provider that is not listed on MiTC at the training start date, and that the MWA will ask for a full refund of any expenses that have been paid for training.

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If the participant is enrolled in a training program that is removed from the MiTC prior to their completion of the training activity, please notify WD at LEO-TSDIV@michigan.gov. A determination will be made on a case-by-case basis following the WD review of the circumstances around the removal of the program from the MiTC.

Section 1-10: ITA Use and Design Options

In consultation with the case manager, an ITA may be issued to eligible participants in need of training. Individuals receiving ITAs may use them to access any training program that is listed as ITA-eligible on the MiTC.

Each local Workforce Development Board shall establish an approval process that reflects the appropriate balance between accountability for training funds with effective customer service. The MWA service center staff may inform and facilitate career decisions, but ultimately, the decision rests with the individual participant.

Each local Workforce Development Board shall establish a range of amounts and/or a maximum dollar amount available for an ITA and establish a mechanism to allow for payment of training dollars to the approved training provider in a timely manner.

Section 1-11: Application Process

Only ITA-eligible programs will appear on the MiTC. If WIOA funds are being used to pay for training, the school must be listed on the MiTC as an eligible training provider at the time of the student's training start date.

Training providers must apply to become certified as a WIOA ITA-eligible training provider. The application can be accessed under the Career Explorer tab on the MiTC [website](#). A training provider is required to submit program information for each program, at each site at which the program is offered.

WD has delegated its approval authority to the MWAs. Following a quality assurance review by WD, the application is then routed to the MWA covering the area in which the school is located and/or the area in which the training program is offered. The MWA reviews the application, and if the training program meets the criteria, the MWA then grants approval as an ITA-eligible program and designates their approval on the system. Once approved, the training provider's program will be eligible to serve the WIOA-eligible customers across the state. In all cases where the program is passed onto the MWA for review and approval, it is the responsibility of the MWA to verify that the credentials are valid (associate or baccalaureate degree, occupational licensure, occupational certificate, occupational certification or licensure, or other industry-recognized certificates of industry/occupational skills completion sufficient to qualify for entry-level or advancement in employment) and that the training program is in high-demand and will meet employer needs within the local area.

Note: All programs expire each July 31st if the provider does not update their program and receive approval for the next year. OSMIS has highlighted the expiration date, and the MiTC website will not list providers/programs past the expiration if approval is not renewed. The website is what informs clients and staff what is available, not the program approval queue. The Current Status only relays the last status of the program for approvers.

MWAs must always use the website, not the approval queue, for decision-making. The screenshot from the approval queue is from administration access and is designed for access by the 30+ approvers designated by MWA leadership; the website is to be used to confirm programs available.

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Section 1-12: Review Process - Minimum Quality Standards

Quality control processes are in effect as each new program is added to the MiTC or submitted for continued eligibility.

The ETP applicants may occasionally fail to proofread or edit the information they provide for publication or inconsistently complete required data elements. Prior to submission to the MWA for review of the applicant's ITA eligibility, WD will conduct a quality assurance review of the training program for responsiveness to the required data elements, including performance metrics, and will check for typographical and grammatical errors. If the training program is not new but has not previously received workforce development funds for training, performance data is still required. The standards are being applied to enforce minimum standards of quality without significant increases in the level of effort necessary to post program information on the MiTC.

During the review process, WD will communicate with applicant training providers by way of automated email. If the application is incomplete or if there are questions that need to be resolved prior to forwarding the application to the MWA for review, the training provider has 30 days to respond. If the provider does not respond within the 30-day timeframe, they will be required to resubmit their training program if they wish to have their training program placed on the MiTC.

When a program is approved by WD, the training provider is notified that the program has passed its quality review and that the program has been forwarded to the MWA for review. The MWA will also receive an email that a program has been submitted for their review and approval.

The MWA reviewer will apply the initial or continued eligibility standards (as appropriate) and approve or fail the program within ten business days. Upon approval by the MWA, ITA-eligible programs are placed on the MiTC.

If the MWA determines that the program does not meet the eligibility requirements set forth in the WIOA and State and/or local policies, the MWA shall issue a denial notice within ten working days. As a separate application for each program is required, a separate notice will be required for each training program that is being denied. The denial notice must clearly identify the program and specific reason(s) for its denial.

A training provider may be denied eligibility for the following reasons:

1. Descriptive information about the training program is not complete.
2. Required performance data is not included with the application.²
3. Inaccurate information regarding a program is intentionally supplied.
4. The training provider is not in good standing, as determined by the MWA.

The denial notice will also advise the training provider of the right to appeal the MWA's decision within 30 working days from the date of the denial, following WD's [Grievance and Complaint Policy](#) in effect at the time of denial for placement on the MiTC.

² For initial eligibility only, training providers wishing to submit new training programs, i.e., programs which have not been in operation long enough to produce graduates, will not be required to provide performance data with their initial application.

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Note: States and local areas should strive only to populate their ETP list with training programs that are successful and proven and remove those providers that fail to achieve positive results for training customers. Also, as local areas utilize real-time data to determine in-demand industry sectors and occupations within their local and regional areas, MWA discretion can be used for consideration of a denial if the local area *knowingly* reviews a training program that will not be utilized for training services and receive ITA funding due to their in-demand lists. The same consideration must be given for those training programs that do not meet the criteria for the MWA's approval of schools under both initial and continued eligibility as found in their local policy.

Section 1-13: New Training Programs

New training programs that have not been in operation long enough to produce graduates are not required to submit performance data with their application for placement on the MiTC. New programs seeking ITA eligibility are exempt from performance reporting requirements in their first year of ITA eligibility because, by definition, no students have ever received the training.

For training providers wishing to submit new training programs, the following conditions apply:

- The training program cannot report historical information on outcomes for graduates because the program lacks a history:
 - The first day of the first class has not yet occurred, AND
 - The program is a new offering for the institution.

Given that most schools regularly modify curricula to meet changing expectation of industry and/or to keep pace with technological and scientific advances, it is not sufficient that a training curriculum has been modified to consider a program a “new” offering.

A program can be considered a new offering if it meets at least one of the following conditions:

- The program prepares students to enter a different occupation than other programs previously or currently offered by the school at the given site.
- The program prepares students to enter a different occupation than other programs previously or currently offered at the school, but the program duration substantively differs. Substantively differs is defined as:
 - ± Fifty percent for programs less than one week in length.
 - ± One week for programs, one week to four weeks in length.
 - ± One month for programs more than one month in length.
 - ± Eight credit hours for academic programs.
- The program is separately licensed by WD Postsecondary Schools or other licensing authority.

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- The admission requirements differ from other current or previous offerings, and the program develops relevant skills to a different level of competency than previously taught, i.e., entry level versus advanced.
- Programs that teach software that is subject to new releases or upgrades are explicitly not new when revised for a new release or upgrade. Schools transitioning software training from one release to the next should report the performance history of the prior version of the training program.
- Programs that constitute a combination or merger of programs offered in the past are not considered “new”.
- WD, in consultation with the governing MWA, may consult historical data submitted to MiTC or published elsewhere by the school if there is doubt that a program submitted as “new” meets the conditions outlined above.

Section 1-14: Eligible Training Providers Located Outside of the State of Michigan

An individual may choose a training provider located outside of the local area, and in some instances, in other states. An out-of-state school must be on its home state’s ETP list in order to be placed on the MiTC. If the out-of-state school provides only online instruction (Technology-Based Learning/Virtual Training Program), the school and the training program must be on the ETP list in the state where the school’s main/home location is based and must still go through the standard approval process. If a school has its home base out-of-state but also has a physical location in Michigan, it must also be licensed as a Michigan proprietary school prior to placement on the MiTC.

Note: For 3rd party vendors (i.e., Coursera), the **training institution** that issues a credential must be listed on the Eligible Training Provider List (ETPL); any vendor that is not issuing the certificate or credential will not be placed on the ETPL.

Following the quality assurance review by WD, schools within the bordering states of **Wisconsin, Ohio,** and **Indiana** will be reviewed for approval by the MWA.

- All apprenticeships will be automatically approved by WD.
- Schools with programs in multiple locations in Michigan will be reviewed and approved by the MWA in the area where the main campus is located.
- Schools in Wisconsin will be reviewed and approved by the UPWARD Talent Council.
- Schools in Ohio will be reviewed and approved by the Southeast Michigan Community Alliance (SEMCA).
- Schools in Indiana will be reviewed and approved by Berrien-Cass-Van Buren.
- All other out-of-state schools will be reviewed and approved by WD.
- Schools located outside of the United States, (including Canadian schools), will not be approved as ETPs.

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Chapter 2: Eligible Training Providers (ETPs)

Section 2-1: Eligible Providers of Training Services

Only training providers that the State determines to be eligible, as required in the Workforce Innovation and Opportunity Act (WIOA), Section 122, may receive the WIOA Title I-B training funds to train participants.

ETPs must be one of the following types of entities:

- Postsecondary education institutions that are:
 - Eligible to receive funds under Title IV of the Higher Education Act of 1965,
 - Provide a program that leads to an associate degree, bachelor's degree, or certificate, and
 - Provide programs that are not funded under Title IV of the Higher Education of 1965.
- Entities that carry out programs under the National Registered Apprenticeship Act of 1937 (50 Stat. 664, Chapter 663, 29 United States Code 50 et. seq.).
- Other public or private providers of training, which may include:
 - Vocational technical schools.
 - Joint labor-management organizations.
 - Private training companies.
 - Proprietary schools.
 - Labor organizations.
 - Employer organizations.
 - Eligible providers of adult education and literacy activities under Title II if such activities are provided in combination with occupational skills training.
- Local boards if they meet the conditions of the WIOA Section 107(g)(1).
- Community-based organizations or private organizations of demonstrated effectiveness that provide training under contract with the local board.
- Distance education programs, also known as e-learning and technology-based learning.
- Registered Apprenticeship programs.

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Under the WIOA, Registered Apprenticeship Programs must be included and maintained on the Michigan Training Connect (MiTC) for as long as the program remains registered under the National Apprenticeship Act. Sections 2-8 through 2-10 further discuss the inclusion of Registered Apprenticeships as ETPs.

Section 2-2: Eligible Training Programs

A program of training services is defined as one or more courses or classes, or a structured regimen that leads to:

- A recognized postsecondary credential,
- An industry-recognized certificate or certification, a certificate of completion of an apprenticeship, a license recognized by the state involved or the federal government,
- Employment, or
- A measurable skills gain toward a credential or employment.

Section 2-3: Procedure for Establishing Training Provider Eligibility – Initial Eligibility

In order to be listed on the MiTC as an ETP, the school must accept WIOA-funded Individual Training Accounts (ITAs). The program must be on the MiTC at the time of the student's training start date into the training program.

The requirements to become an ETP apply to all organizations providing the WIOA Title I-B funded training to adults and dislocated workers, with the specific exception of Registered Apprenticeship programs.

With the exception of Registered Apprenticeship programs, for all programs that have not been previously eligible, providers must submit required information, including performance, in order to have their programs considered for initial eligibility in accordance with the Michigan Department of Labor and Economic Opportunity, Workforce Development (LEO-WD) procedures.

In establishing initial eligibility procedures and criteria, at minimum, the following standards apply:

- A description of each program of training services to be offered.
- Proof of proprietary school licensure.
- Information concerning whether the provider is in partnership with business. This could include information about the quality and quantity of employer partnerships.
- Other information in order to demonstrate high-quality training services, including whether the training program leads to a recognized postsecondary credential.
- Information that addresses the alignment of the training with in-demand industry sectors and occupations.

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- With the exception of new³ training programs, provide information addressing a factor related to the indicators of performance, as described in the WIOA Section 116(b)(2)(A)(i)(I)-(IV), which include unsubsidized employment during the second quarter after exit, unsubsidized employment during the fourth quarter after exit, median earnings, and credential attainment.

Training providers wishing to submit new training programs (i.e., the first day of the first class has not yet occurred and/or the program is a new offering for the institution and meets the new program conditions), will not be required to provide information related to performance accountability indicators, but will be required to provide the information related to all of the remaining minimum standards.

Training providers that have successfully met the terms of a job training contract under state or federal workforce development program such as the WIOA, the Workforce Investment Agency (WIA), or its predecessor (the Job Training Partnership Act [JTPA]), will be required to provide information related to all of the minimum standards.

Even if a program is not new but has not previously received workforce development funds (WIOA, WIA, or JTPA) for training, it will still be required to provide information related to all minimum standards.

Local areas may set higher levels of performance than the state minimum performance as criteria for training providers to be placed on the MiTC. The Michigan Works! Agencies (MWAs) may also request additional information, such as the name of, the quality, and quantity of employers involved in partnership with the training institution and/or additional information about the school's alignment with in-demand industry sectors or occupations, etc.

Local areas must have a policy in place that indicates how performance will be measured to ensure that local performance standards are applied in a consistent and objective manner. Local policies related to ETPs and the MiTC are subject to examination during the WIOA program review process.

Once approved by the MWA, the program is designated as ITA-eligible on the MiTC and approved to serve ITA-eligible customers across the state. However, being approved to appear on the MiTC does not guarantee that any students will select the program or that MWAs will make referrals.

Where the health and safety of students and others may be at risk, the MWAs have the right to deny initial eligibility, based on supplemental information received about a training provider.

Training providers that are not approved for placement on the MiTC have the right to appeal the MWA's decision within 30 working days from the date of the denial, following the [WD Grievance and Complaint Policy](#) in effect at the time of denial of initial eligibility.

Section 2-4: Procedure for Establishing Training Provider Eligibility - Continued Eligibility

All ETPs are subject to continued ITA eligibility procedures and minimum program performance standards each year thereafter. Continued eligibility requirements apply to training providers transitioning to the WIOA Title I-B who were previously eligible under the WIA Title I and newly eligible

³ *New programs are programs that the first day of the first class has not yet occurred and/or the program is a new offering for the institution and meets one of the new program conditions. Refer to Chapter 1, Section 1, of this manual.*

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training providers that were determined to be initially eligible under the WIOA Title I-B. Continued ITA eligibility in Michigan is determined on a rolling basis, with a program's initial eligibility period expiring on August 1, if they have not renewed within the renewal period of July 1 through 31 each year. While the WIOA states that all providers are subject to review and renewal of their eligibility *at a minimum* every two years; due to proprietary school licensure processes and requirements, Michigan will be reviewing eligibility on an annual basis.

Note: The renewal period for training providers currently on the MiTC will be July 1-31 of each program year. For clarification, training providers are not removed from the MiTC during this renewal period; **however, they will be removed as of August 1 if they have not renewed.** New providers may *apply* at any time of the program year, but all providers must renew at the same time (July 1 through 31) regardless of when they applied and were approved for performance reporting purposes.

MWAs must always use the MiTC website, **not the approval queue**, for decision making of approved and active training programs for all participants. The website holds current status and informs clients and staff of what training programs are currently available. Under the program approval queue, MWA administrators will see the "Current Status" section, but this only relays the last status of the program, not that it is still currently active (i.e., it could have been removed due to compliance, the provider may not have renewed, etc.).

- The WIOA requires that providers seeking continued eligibility must provide verifiable program-specific performance information. The indicators of performance include unsubsidized employment during the second quarter after exit, unsubsidized employment during the fourth quarter after exit, median earnings, and credential attainment.
- Information identifying the recognized postsecondary credentials received by all training participants.
- Program cost information, including tuition and fees for the WIOA participants in the program.
- Information on the program completion rate for the WIOA participants.

The state and local areas must also consider factors, such as:

- Access to training services throughout the state using technology, including rural areas.
- Information reported to state agencies on federal and state training programs other than WIOA Title I-B.
- The degree to which training programs relate to in-demand industry sectors and occupations within the state.
- State licensure requirements, and the licensing status of training providers, if applicable (See Chapter 4 – *Licensing Requirements*).
- The provider's ability to offer industry-recognized certificates and/or credentials.
- The ability of providers to offer programs that lead to postsecondary credentials.

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- The quality of training program services, including a program that leads to a recognized postsecondary credential.
- The ability of providers to provide training services that are physically and programmatically accessible for individuals who are employed and for individuals with barriers to employment, including individuals with disabilities.
- The timeliness and accuracy of training providers' performance reports.
- The state requirement that training providers must submit performance and cost information, including tuition and fees, annually for each of the provider's programs of study that are on the ETP list.
- Criteria that require collection of information to demonstrate compliance must not be unduly burdensome or costly to providers (20 Code of Federal Regulations (CFR) 680.460(h)(2)).
- States are also responsible for ensuring the quality and value of ETPs. Local areas may include other factors determined to ensure quality and value, as appropriate, including, but not limited to:
 - The training provider's accountability,
 - Confirmation the training participants are given an informed choice among providers,
 - The provider's ability to partner with employers and to provide job placement services,
 - The provider's student dropout rate, and
 - The provider's student loan default rate.

Continued eligibility applications for programs failing to meet State-specified performance standards may be considered for eligibility at the discretion of the reviewing MWA, provided the training provider can provide a sufficient reason for a program to be exempt from performance standards. Local areas must have a policy in place for approving programs failing to meet State-specified performance standards.

Local areas may set higher levels of performance than the State minimum as criteria for training providers to remain on the MiTC. To ensure that local performance standards are applied in a consistent and an objective manner, local areas must have a policy in place that addresses minimum performance standards if performance levels are higher than the State's minimum standards.

The MWAs have the authority to consider local economic conditions and the economic and demographic characteristics of the students a school serves when reviewing applications for continued eligibility. Training providers seeking continued eligibility approval under these circumstances must be able to provide supportive/supplemental documentation for each training program affected. The continued eligibility application will either demonstrate that the program performance is at or above the State standards or will include an initial justification of below-standards performance. The MWA reviewing the application reserves the right to determine whether the justification provided by the training provider is satisfactory for approval. If the initial justification of below-standards performance is not satisfactory to the MWA, the "reason for disapproval" must be provided to the applicant. Where the health and safety of students and others may be at risk, the MWAs have the right to deny continuing eligibility, based on supplemental information received about a training provider. Training providers that are not approved for placement on the MiTC have the right to appeal the decision within 30 working

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days from the date of the denial, following the [WD Grievance and Complaint Policy](#) in effect at the time of denial for continuing eligibility.

Note: WIOA statute nor final rules define “quality” for ETP programs. Therefore, states may define “quality” with respect to a program of training services. As defined under *Section 2-2: Eligible Training Programs*, Michigan considers the quality of a program to meet, *at a minimum*, one or more courses or classes, or a structured regimen that leads to:

- Recognized postsecondary credential,
- Industry-recognized certificate or certification, a certificate of completion of an apprenticeship, a license recognized by the state involved or the federal government,
- Employment, or
- Measurable skills gain toward a credential or employment.

Section 2-5: Deeming Providers Ineligible (Removal of Provider)

The state is required to establish procedures for removing a provider from the MiTC.

Provider Removal Criteria

During the continued eligibility process, the MWAs will have access to programs on the MiTC failing program performance measures. The ITA eligibility designation will be removed from the MiTC unless the governing MWA wishes to retain a given program on the MiTC. The MWAs wishing to grant an exception, based on local economic conditions and the economic and demographic characteristics of the students a school serves, should ensure that local policy identifies a process for granting exceptions and notify the training provider.

Providers may be also removed under the following conditions:

- Inaccurate information regarding a program is intentionally supplied; a termination of eligibility will occur for a period of not less than two years.
- It is determined an eligible provider has substantially violated any requirements under the Act; the provider’s eligibility to receive funds for the program(s) in question will be terminated for a period of not less than two years.
- If a training provider does not reapply under the continued eligibility procedures; they will be removed from the MiTC. The training provider will be required to reapply under continued eligibility procedures and have met performance prior to having their program placed back on the MiTC.
- A provider must deliver positive results and provide accurate information about those results. If a provider fails to meet or exceed established performance levels; the provider’s eligibility to receive funds may be suspended for a period of not less than two years. At the end of the two-year period, the provider would have to reapply under continued eligibility provisions. The provider would only be placed back on the MiTC following a determination by the local area as to whether performance is now at an acceptable level.

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- A training provider that substantially violates the terms outlined in a training agreement with an MWA or one of its sub-recipients may be considered as non-compliant as defined under Section 122 (f) of the WIOA and thereby subject to removal from the MiTC. An example of a substantial violation may include, but is not limited to, ceasing operations prior to delivering all training services.
- Where the health and safety of students or others could be at risk, the MWAs have the right to request removal of a training provider, based on supplemental information received. The MWA must first notify WD in writing that they are requesting that the training provider be removed from the MiTC. Once approved by the WD, the MWA must then notify the school that they will be removed from the MiTC and of their right to appeal following the WD Grievance and Complaint Policy Issuance in effect at the time of the training provider's removal from the MiTC.

Provider Removal Process from the ETP List

Both state-level MiTC staff and local MWAs have the authority to remove a program. The State and local areas review provider eligibility information to assess the renewal of training provider eligibility annually (July).

How the removal process is initiated:

At the state-level (WD), when reviewing programs for initial or continued eligibility annually, the training provider is notified via an automated system notice if they do not meet eligibility criteria. Once receipt of additional information or clarification is obtained from the training provider, the State has the option to approve or fail said training provider and/or program. If removed, the training provider will receive an email notification stating reason for removal and will be afforded an opportunity to re-apply once the reason for removal is rectified.

The local level process is the same as the State process; once the local area has received the training program(s) forwarded from the State they may determine approval or denial. If a removal is determined for continuing eligibility, then the MWA must notify the State for removal.

If the WD receives any notification that a provider may be in violation of federal and state statutes/regulations, an investigation will be conducted on a case-by-case basis.

How long does the removal process take?

A program may be removed as soon as a decision is made for removal.

How often is the list reviewed to identify programs for removal?

ETP lists are reviewed annually during the renewal process at both the State and local level. Verification of licensure is confirmed during initial and continued eligibility; Proprietary School licensure information is being integrated into the MiTC system for continued verification. For programs brought to the attention as identified for removal throughout each program year, a determination will be made on a case-by-case basis following the WD review of the circumstances around the requested removal of the program from the MiTC.

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When can a removed program re-apply?

The re-application process is determined on a case-by-case basis depending on the training provider's ability to rectify the reason for removal (i.e., Has the reason why they were removed been resolved?).

Does the process for removal differ between providers and individual programs?

WD has authority to disable a provider and remove all programs from the MiTC. Local areas must notify WD if they wish to remove/disable/de-activate a provider or program. If WD removes a provider all programs tied to that provider would be removed.

Individual programs may be removed without a provider being removed if the program does not meet required criteria (de-activated or denied by State/MWA). WD has the authority to de-activate programs, which removes them from the MiTC website as well.

The training program is required to be listed on the MiTC at the time of the participant's training start date of the training program and remain on the MiTC with subsequent semester(s) or term(s), with special attention given to **August 1 and after (after July renewal period)**.

Note: States and local areas can review outcome data for training providers through www.trainingproviderresults.gov coupled with the latest employer demands to determine which providers should remain on eligible training provider lists. Local areas can use data on who has accessed services to inform outreach strategies, and outcomes data to adjust service delivery.

If the participant is enrolled in a training program that is removed from the MiTC prior to their completion of the training activity, please notify WD at LEO-TSDIV@michigan.gov. A determination will be made on a case-by-case basis following the WD review of the circumstances around the removal of the program from the MiTC. Local MWAs will work with the participant on how to address the completion of a training program or transition of participants for completion of training. The intent is not to remove individuals who have started training and are close to completion if possible; the appropriate action is to allow the participant to finish training, if applicable.

The ETPs are subject to the equal opportunity and nondiscrimination requirements contained in Section 188 of the WIOA.

Section 2-6: Appeals Process for Providers Removed from or Denial of Eligibility on the MiTC

Providers **removed** from the MiTC must be afforded the opportunity to appeal the removal. The training provider has the right to appeal their removal from the MiTC within 30 working days from the date of the revocation, following the [WD Grievance and Complaint Policy](#) in effect at the time of training provider's removal from the MiTC.

States must establish an appeals procedure for providers of training to appeal a denial of eligibility. In the event where a **provider** is not approved during the initial application review process (i.e., provider who does not meet eligibility or licensing requirements), State-level MiTC staff will communicate information on how to become eligible by referring them to appropriate agencies and/or information.

When a **program** is denied by the State during the initial application review, the system generated notification will include the WD or MWA-entered reason for denial and include appeal process language. State level appeals can be addressed to the Talent Information Systems (TIS) supervisor

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and sent to LEO-MiTC@Michigan.gov for review. A final determination at the state level stands and is not afforded an additional appeal.

Section 2-7: The MWA Discretion Where the WIOA and State-Level Policy are Silent

The MiTC and its application process reflect and implement the WIOA and State-level policy. Where both State policy and the WIOA are silent, local MWA reviewers must exercise discretion. In the review of continued eligibility applications, there are occasions requiring the MWAs to exercise discretion and for which a **local policy is required**:

1. Programs that do not meet local performance standards can be approved or disapproved at the discretion of the MWA. For example, if a program fails to meet performance standards, the school may provide supplemental information that demonstrates that local economic conditions render the earnings and credentials expectations unrealistic and/or that the program serves many hard-to-serve students, rendering the completion expectations unreasonable. The MWA may request additional information and approve or disapprove the program at its discretion.
2. Programs that neither meet nor fail to meet performance standards. A program neither meets nor fails to meet performance standards if it lacks a documented track record, such as programs with cohorts lasting more than one year that can experience years in which no one graduates, and no one drops out and for which a credentials attainment rate cannot be calculated. Similarly, if all program graduates transfer to continuing education in a related field, there may be zero graduates available for employment, and therefore, their wages are undefined. In such situations, the MWA may request additional information and approve or disapprove the program at its discretion.

All above conditions requiring the MWA to exercise discretion may also apply to initial eligibility applications. For those schools that do not meet any of the WIOA criteria for initial eligibility, the MWA, at its discretion, may require full performance data, including completion, employment, and wage information. In such circumstances, the reduced data requirements associated with initial eligibility do not apply.

Section 2-8: Registered Apprenticeships - Overview

Registered Apprenticeship is a national training system that combines paid learning with on-the-job related technical and theoretical instruction in a skilled occupation to prepare workers for highly skilled careers. The purpose of a Registered Apprenticeship program is to enable employers to develop and apply industry standards to training programs that can help employers recruit, build, and increase productivity, and retain a highly skilled workforce. Workers benefit from apprenticeships by receiving skills-based education to prepare them for good-paying jobs. Certifications earned through Registered Apprenticeship programs are recognized nationwide as portable industry credentials. Registered Apprenticeships result in positive outcomes. Any Registered Apprenticeship program taking applications is considered an in-demand occupation, as by definition, these employers are hiring.

Section 2-9: ITAs to Support Registered Apprenticeships

For eligible apprentices, ITAs may be used to support the related instruction portion (e.g., classroom-based, or online learning) of their Registered Apprenticeship, or in partnership with Registered Apprenticeship sponsors can be used to support customized or on-the-job training agreements.

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Registered Apprenticeship programs are not subject to the same application and performance information requirements or subject to a period of initial eligibility or initial eligibility procedures as other providers, since they already go through a detailed application and vetting procedure to become a Registered Apprenticeship program sponsor with the U.S. Department of Labor (USDOL) or a state's apprenticeship agency, if applicable. Therefore, Registered Apprenticeships are not required to report performance information.

All Registered Apprenticeship programs are eligible for inclusion on the MiTC. Under the WIOA Title I-B, Registered Apprenticeship program sponsors that request to be placed on the MiTC are automatically included and will remain on the MiTC for as long as the program is registered or until the program sponsor notifies the State that it no longer wants to be included on the MiTC. In lieu of local area review, WD will be approving all Registered Apprenticeship programs, based on the WIOA's automatic placement criteria.

Registered Apprenticeships can take many forms, and the sponsors are diverse, including:

- Employers who provide related instruction. A number of employers with Registered Apprenticeship programs provide formal in-house instruction, as well as on-the-job training at the work site. The employer is the ETP.
- Employers who use an outside educational provider. Under this model, Registered Apprenticeship program sponsors do not provide the related instruction or education portion of the apprenticeship but rely upon an outside educational entity to deliver instruction. Employers can use two-year or four-year postsecondary institutions, technical training schools, eligible providers of adult education and literacy activities under Title II, or online courses for related instruction. The employer is the ETP and must identify their instructional provider.
- Joint Registered Apprenticeship training programs. These programs are made up of employers and unions. They have an apprenticeship training school where the instructional portion of the Registered Apprenticeship program is delivered. The training schools are usually administered by the union, in which case, the union would be the ETP.
- Intermediaries. Intermediaries can serve as program sponsors when they take responsibility for the administration of the apprenticeship program. They can also provide expertise such as curriculum development, classroom instruction, and supportive services as appropriate. The intermediary is the ETP and must identify the instructional provider if an outside organization is providing the education portion of the apprenticeship. Intermediaries can include:
 - Educational institutions including two-year and four-year postsecondary institutions, technical schools, or eligible providers of adult education and literacy services under Title II. In this model, the educational institution administers the program, works with employers to hire apprentices, and provides classroom or online instruction for the apprenticeship program.
 - Industry associations that administer the program and work with employer/members and educational entities and the community to implement the apprenticeship program.
 - Community-based organizations that administer the program and work with employers, educational entities, and the community to implement the apprenticeship program.

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- The MWAs that administer the program and work with employers, educational entities, and the community to implement the apprenticeship program.

Section 2-10: Connecting Registered Apprenticeships to the Public Workforce System

Registered Apprenticeships can be funded through several mechanisms. Given the unique nature of Registered Apprenticeships, there are several ways in which training services may be used in conjunction with these programs:

- Registered Apprenticeships generally involve both classroom and on-the-job instruction. An on-the-job training contract may be developed with a Registered Apprenticeship program for training participants. On-the-job training contracts are made with the employer. The on-the-job training contract may be made to support some or all of the on-the-job training portion of the Registered Apprenticeship program,
- A combination of an ITA to cover classroom instruction along with an on-the-job training contract to cover some or all of the work-based training portion of the Registered Apprenticeship is allowed, and
- Incumbent worker training may be used for upskilling apprentices who already have an established working/training relationship with the Registered Apprenticeship program.

Local areas may also include support services, in coordination with career and/or training services to participants in a Registered Apprenticeship program. The supportive services must be consistent with the WIOA Section 134(d)(2) and state and local policies.

The USDOL recognizes that many individuals in need of training services may not have the resources available to participate in training. Needs-related payments are designed to provide a participant with resources to enable them to participate in training services and can help individuals meet their non-training expenses in order to successfully complete their training. According to Section 134(d)(3)(B) of the WIOA, a participant must be enrolled in a training program described in 134(c)(3) of the WIOA in order to receive needs-related payments.

Section 2-11: Adding Registered Apprenticeship Programs to the MiTC

Regarding Registered Apprenticeship Program (RAP) sponsors, RAPs are automatically eligible to be included on the ETP list and are exempt from state and local ETP eligibility requirements.

Similar to the RAP exemption from the eligibility requirements, RAPs are also exempt from ETP performance reporting requirements in WIOA Sections 116(d)(4) and 122, including any additional ETP reporting requirements that have been added by the state or local area. This also means that the states and local areas must not establish any RAP specific performance reporting requirements; however, RAPs may voluntarily report performance outcomes.

RAP sponsors must indicate their interest in being an ETP to be included on the list. State agencies cannot add sponsors to the state ETP list without the sponsor submitting such a request. States are required to work with the federal Office of Apprenticeship state director, or if applicable, the State Apprenticeship Agency⁴ to develop a mechanism to contact all RAPs within the state to allow them to indicate interest and provide a process through which RAPs can opt-in for placement on the ETP list.

⁴ *State Apprenticeship Agency does not apply to the State of Michigan.*

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In addition to providing contact and program-specific information as identified in Section 1-7, RAPs are required to provide the following basic information for placement on the MiTC, as identified in TEGL 8-19, issued January 2, 2020:

- Occupations included within the Registered Apprenticeship Program(s).
- Contact information including the name and address of the Registered Apprenticeship sponsor.
- The name and address(es) of the Related Technical Instruction provider(s), and the location(s) of instruction if different from the program sponsor's address.
- The method and length of instruction.
- The number of active apprentices.
- RAP sponsors that do not provide the related technical instruction portion of the apprenticeship program may be required to provide additional information about their education provider, including the cost of instruction. (This is the only time that cost information should be requested).

Process for RAP Sponsor Notification of Eligible Training Provider List (ETPL) Registration

Per WIOA Section 680.470(a), states are required to develop a mechanism to contact all RAPs within the state in order to allow them to indicate interest. The state must work with the federal Office of Apprenticeship (OA) State Director, or if the state oversees the apprenticeship system, it must develop a mechanism to contact all RAPs within the state to allow them to indicate interest.

Michigan's mechanism for notifying state RAP sponsors is communication via WD's email marketing system that allows sponsors to indicate interest in the ETPL. This communication takes place in full partnership with the OA State Director and is distributed periodically to all RAP sponsors, at a minimum, annually. The communication includes:

- Encouragement to sponsors to list RAPs on the MiTC.
- An explanation that RAPs will reside on the MiTC as long as the program(s) remains registered, or until the sponsor notifies the MiTC to remove the program(s).
- An explanation of WD's State Apprenticeship Expansion (SAE) team's relationship to the USDOL Michigan Office of Apprenticeship regarding services.
- In addition to the MiTC notification, other services and resources may include:
 - Strategic outreach to RAP sponsors promoting program expansion by adding occupations.
 - Michigan State Approving Agency for utilization of GI Bill® educational benefits.
 - SAE's On-the-Job Training, Related Technical Instruction, and supportive services resources:

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- [Going PRO Talent Fund](#)
- [Michigan Industry Cluster Approach](#)
- [Discretionary sub-grant opportunities](#)
- Free services to assist employer sponsors with reaching broader talent pools of potential apprentices for their RAP:
 - [Michigan Training Connect](#)
 - [Pure Michigan Talent Connect](#)
 - [Pathfinder](#)
- Contact information provided for any additional assistance for registration on the [MiTC](#).

States must maintain RAPs on the list until:

- The RAP program notifies the state agency it no longer wants to be included on the list;
- The program becomes deregistered under the National Apprenticeship Act;
- The program is determined to have intentionally supplied inaccurate information; or,
- A determination is made that the RAP substantially violated any provision of Title I of WIOA or the WIOA regulations, including 29 CFR part 38.

Note: *Automatically* adding RAPs or allowing opt-outs is not permissible per federal guidance. Apprenticeship sponsors must submit a request to opt for inclusion or removal from the ETP list.

Being identified on the MiTC as a Registered Apprenticeship sponsor does not signify that the sponsor is taking applications for apprenticeship or employment. Program sponsors determine individually when they will take applications.

Additional information on Registered Apprenticeships may be found on the [USDOL's website](#).

The [Registered Apprenticeship Sponsors Database](#) provides information about apprenticeship and training programs nationwide.

Section 2-12: Apprenticeship Interim Credentials

Through the authorization of interim credentials, the National Apprenticeship System recognizes that some industries and occupations are more amenable to an incremental recognition of an apprentice's increasing skills, knowledge, and abilities. In such industries, the use of interim credentials can afford multiple opportunities for apprentices to grow and expand their knowledge and their capacity to meet current, new, and emerging industry advances. Use of interim credentials also recognizes the fact that not all apprentices will complete their apprenticeship programs and offers opportunities for recognition of what these individuals have learned. Therefore, interim credentials will also enable apprentices to obtain portable credentials commensurate with the skills and competencies acquired and demonstrated throughout an apprenticeship.

Interim credentials are issued by the USDOL, upon request of the appropriate sponsor, as certification of an apprentice's attainment of competency. Furthermore, the regulations do not require program sponsors to include interim credentials in their program standards, nor do they require sponsors to

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request that a Registration Agency issue interim credentials to apprentices registered in their apprenticeship programs.

Interim credentials may be issued only for the industry-recognized components of an apprenticeship occupation. Program sponsors identify and define all interim credentials in the program standards that are registered with the USDOL.

Section 2-13: State Review - Verifying Registered Apprenticeship Program ETP Status

Under the WIOA, states are required to compile a list of eligible training providers, with special consideration granted to Registered Apprenticeship (RA) programs for placement on the list. States are required to develop a procedure to verify the *status* of Registered Apprenticeship programs as part of the State's yearly review of the ETP list. Biannually, WD will work with the federal Office of Apprenticeships to obtain a listing of all Registered Apprenticeship programs that are either voluntarily or involuntarily de-registered. WD will then update the MiTC accordingly.

Section 2-14: Pre-Apprenticeship Programs

Pre-apprenticeship programs do not have the same automatic status under the WIOA Title I-B as do Registered Apprenticeship programs.

The USDOL recognizes pre-apprenticeship programs but does not formally register them. Pre-apprenticeship programs act as a bridge, with the intent to place participants into Registered Apprenticeship programs. The ITAs may be used to provide individuals with access to the technical and theoretical portions of the pre-apprenticeship training in preparation for placement in a Registered Apprenticeship program. Pre-apprenticeship program training providers are not registered or certified by the USDOL; therefore, the related technical instruction portion of their curriculum and training program must meet all ITA eligibility requirements, and the curriculum must be based on industry standards. Pre-apprenticeship programs require at least one, if not more, documented partnership(s) with a Registered Apprenticeship program(s) to ensure that the pre-apprenticeship program will prepare individuals with the skills and competencies they need to enter one or more Registered Apprenticeship programs.

Pre-apprenticeship programs generally consist of the following:

- Training and curriculum that aligns with the skill needs of employers in the economy of the state or region involved.
- Access to educational and career counseling and other supportive services, directly or indirectly.
- Hands-on, meaningful learning activities that are connected to education and training activities, such as exploring career options, and understanding how the skills acquired through coursework can be applied toward a future career.
- Opportunities to attain at least one industry-recognized credential.
- A partnership with one or more Registered Apprenticeship programs that assists in placing individuals who complete the pre-apprenticeship program into a Registered Apprenticeship program.

Section 2-15: Apprenticeship and Pre-Apprenticeships as Part of a Cluster Strategy

Both apprenticeship and pre-apprenticeship training programs can be an important part of an industry and cluster development strategy, as well as an effective means of advancing growth and competitiveness for individual small and/or groups of related businesses. In a demand-driven environment, the public workforce system at the federal, state, and local levels work collaboratively with business and industry, economic development, education, training providers, and other key partners on talent development strategies and workforce solutions to provide workers with the skills businesses need. Registered Apprenticeship is a potential workforce solution that contributes to the development of industry-defined competencies and serves as a proven industry-driven workforce education and preparation strategy for workers.

Section 2-16: Training Programs Exempt from WIOA ETP Provisions

Not all allowable types of training are subject to the ETP provisions in the WIOA Title I-B. Work-based training may be provided under the authority of several types of training services authorized under the WIOA, such as programs that combine workplace training with related instruction or training programs operated by the private sector, if the provider of the related instructional portion of the training program is listed on the MiTC.

Training services exempt from the WIOA Section 122 eligibility requirements include:

- Registered Apprenticeship Programs (automatically eligible to be included on the ETP list).
- On-the-job training, which may also include placing participants into a Registered Apprenticeship program).⁵
- Customized training.
- Incumbent worker training.
- Internships.
- Paid or unpaid work experience.
- Circumstances described in WIOA Section 134(c)(3)(G)(ii), where the Local Board determines that:
 - There are insufficient providers, or
 - There is a training program with demonstrated effectiveness offered in the local area by a community-based or other private organization to serve individuals with barriers to employment.

⁵ *If the Registered Apprenticeship Program does not utilize WIOA Title I-B funding for the technical training (classroom instruction) portion of the Registered Apprenticeship training program.*

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- It is most appropriate to award a contract to an institution of higher education or other ETP to facilitate the training of multiple individuals in in-demand industry sectors or occupations, and the contract does not limit consumer choice.
- When the Local Board provides training services through a pay-for-performance contract.

On-the-job training, customized training, incumbent worker training, internships, paid or unpaid work experience are exempted from the training provider eligibility requirements under WIOA Section 122, but the WIOA does require that each state disseminate a list of eligible providers of work-based (and non-work-based) training each year. Local areas are required to provide their list for each program year to the State for dissemination to the MWAs.

Section 2-17: Serving Participants in the Trade Adjustment Assistance (TAA) Program

The TAA program does not contain the WIOA Section 122 requirements that only training providers that the state determines to be eligible, including apprenticeship programs, may receive training funds.

The TAA participants may select a training program offered by a provider on the MiTC, and the MWA may approve that training if it meets the criteria for TAA training approval for that participant. If a participant is co-enrolled in a WIOA program and TAA, the TAA program may also fund training by a provider that is not on the MiTC. However, if a co-enrolled participant receives training covered under the WIOA, then the requirements under WIOA Section 122 apply.

Section 2-18: Stand-Alone Programs - Career Services

Stand-alone programs, such as job readiness (unless provided *in combination* with other training services or transitional jobs), basic skills, career exploration, reading literacy programs, and transitional employment will not be considered training programs eligible for ITAs. Educational programs that are not occupation-specific and are less than 90 days in duration are a WIOA career service. These programs provide instruction wherein knowledge obtained can be used in many different jobs and therefore, are not industry or job specific. They are designed to provide participants with short-term skills upgrade assistance to enable them to become job-ready or advance up the career ladder.

- Skill enhancement is short-term and pre-vocational, and is therefore classified as a career service.
- Short-term, pre-vocational services are not tied to a specific occupation and include course-like services such as literacy and adult basic education, workplace literacy, introductory courses, such as introduction to computers, the development of learning skills, communication skills, punctuality, personal maintenance skills, and professional conduct to prepare individuals for unsubsidized employment or training.
- Section 680.410 (a)(3) of the WIOA Final Rules stipulates that adult education and literacy activities under WIOA Title II may only be provided in combination with occupational skills training, on-the-job training, incumbent worker training, programs that provide workplace training and related instruction, which may include cooperative education programs, training programs operated by the private sector; skill upgrading and retraining, or entrepreneurial training.

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- Commercially available off-the-shelf skill refresher programs designed to assist individuals who have completed training but need courses of study to renew a license are career services. Examples include Registered Nursing or Licensed Practical Nurse *refresher* courses.

Exceptions to where training programs are considered as career services may include some educational programs offering certifications but are non-occupation specific.

Section 2-19: Distance Learning/E-Learning/Online Technology-Based Learning (TBL) Programs

Distance learning (also referred to and used interchangeably as TBL) is education in which students take academic courses by accessing information and communicating with the instructor asynchronously over a computer network. The TBL is an umbrella term which encompasses related terms such as online learning, web-based learning (which only includes learning that occurs via the Internet), Compact Discs and Digital Versatile Disks, and computer-based learning (learning using dedicated personal computers). Distance learning is via audio and video conferencing, internet bulletin boards, chat rooms, webcasts, simulations, gaming, and a variety of mobile operations such as podcasting.

There are no restrictions in WIOA statute, regulations, or guidance prohibiting states from approving virtual and online training programs from being included on their state list of eligible training providers. While distance learning is not identified as a type of training activity under the WIOA, states can utilize technology to allow for remote access to training services provided through the One-Stop delivery system. The USDOL recognizes that there are many different means by which individuals may receive training and that the use of technology may be particularly helpful to participants in rural areas. States are encouraged to develop and build upon strategies that enable job seekers to connect with the workforce system, including access to training, remotely.

In keeping with the intent to maximize customer choice, the USDOL encourages states and local areas to include distance education programs on their state's ETP lists, as appropriate, to ensure the broadest array of available resources. Distance education programs, also known as e-learning, technology-based, or distance learning may be incorporated as a technical instruction component of training. When used appropriately, TBL provides a valuable tool for expanding options for training and other activities.

To increase capacity and access to online learning, many of the services delivered in-person can be adapted to online delivery. State and local workforce boards must be responsive to employers' and customers' needs by providing more virtual, online, and off-site services. While there is demonstrated value in in-person service delivery, safety and health considerations may prohibit this delivery option. An increased capacity to deliver robust services through a virtual medium, including the use of local and state boards that can review the training offerings available in ETP lists, will ensure that training offerings are aligned with jobs for which there is currently demand or that can reasonably be expected to rebound in the future. Local areas also have an opportunity to consider increased usage of online training, for class-size training as well as inclusion in ETP lists.

Non-degree granting proprietary or trade schools, with no physical presence in Michigan, providing distance education/TBL to Michigan residents, need to be licensed under the Proprietary Schools Act (1943 Public Act 148). If the school providing TBL is out-of-state, the training program must be on the ETP list within the state where the school's main/home location is based. Unless TBL is being used as a career service, it must meet all other MiTC standards including performance and result in a degree or certification.

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Degree granting out of state colleges and universities, with no physical presence in Michigan, providing distance education to Michigan residents need to be authorized under the Higher Education Authorization and Distance Education Reciprocal Exchange Act (2015 PA 45).

Further information can be found at [LEO-Postsecondary Schools](#).

Section 2-20: Self-Employment and Entrepreneurship Training

Supporting the development of new small businesses through entrepreneurship is an increasingly important strategy in supporting emerging and high-growth companies in Michigan. Providing entrepreneurship training and assistance in a systemic and strategic fashion is another way the workforce system can help new Michigan businesses grow through the leveraging of resources to support unemployed and underemployed workers and to create jobs. Adding entrepreneurial skills training programs to the ETP list and encouraging recipients of Individual Training Accounts to pursue entrepreneurial skills training, where appropriate, helps to support growth within this training option.

The WIOA allows states to provide Adults and Dislocated Workers occupational skills training, including training for non-traditional employment and entrepreneurial training. Self-employment and entrepreneurship training programs can and should be licensed and included on the MiTC.

The WIOA funds may be used to pay costs associated with obtaining a skill or credential that demonstrates the expertise of the entrepreneur or small business owner. Examples include a barbering credential, a certified pension consultant, title examiner, or notary. Funds may not be used to cover the costs associated with standard business licenses or degrees that do not pertain to a specific skill or occupation.

Section 2-21: Credentials

It is important to note that the WIOA performance measure of the credential attainment is not simply to increase the *number* of credentials gained by participants; the credential should ultimately equip participants to enter or re-enter employment, retain employment, or advance within an occupation because of attaining occupational credentials.

Under WIOA, the term “Recognized Postsecondary Credential” means 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. A credential must be awarded in recognition of an individual's attainment of measurable technical or occupational skills necessary to gain employment or advance within an occupation. These technical or occupational skills are generally based on standards developed or endorsed by employers.

The USDOL does not recognize Cardiopulmonary Resuscitation (CPR) or Occupational Safety and Health Administration (OSHA) certificates as counting towards the attainment of a degree or certificate in the WIOA performance, as they do not meet Employment and Training Administration's intent of its credential definition. A credential must be awarded “in recognition of an individual's attainment of measurable technical or occupational skills necessary to gain employment or advance within an occupation.” While a CPR or an OSHA training may provide benefit to a participant 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.

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It is important to note that while CPR and OSHA certificates do not count towards a credential measure, the WIOA funds can pay for CPR and OSHA training if such training is relevant to the design of an individual's service plan or included as part of a larger training program, such as training for certification as an Emergency Medical Technician in the case of CPR training or a Lead Abatement Specialist in the case of OSHA training.

For additional information about credentials, please refer to Chapter 7 of the WIOA Manual.

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Chapter 3: Performance Standards

Section 3-1: Required Performance Criteria for Initial Individual Training Account (ITA) Eligibility

The Workforce Innovation and Opportunity Act (WIOA) requires providers seeking initial eligibility to provide verifiable program-specific performance information. At minimum, applicants must provide:

1. A description of each program of training services to be offered.
2. Information addressing a factor related to the indicators of performance, as described in the WIOA Sections 116(b)(2)(A)(I)(I)-(V) and 20 CFR 680.460(g)(I) through (4).

State-established minimum performance standards for both initial and continued eligibility are determined by bi-annual performance negotiations with all local areas utilizing the WIOA Dislocated Worker for basis of minimum percentages.

- For each Program Year, the following minimum performance indicators will apply:
 - Unsubsidized employment during the second quarter after exit
 - Unsubsidized employment during the fourth quarter after exit
 - Median earnings
 - Credential attainment
- 3. Information addressing whether the training provider is in partnership with a business.
- 4. Other information required (locally or by the state) to demonstrate high-quality training services with in-demand industry sectors and occupations, to the extent possible.

Note: When reviewing applications for initial and continued eligibility, please keep in mind the performance standards in place at the time data was collected are the standards that must be utilized to evaluate performance outcomes.

As noted in Chapter 2, Section 2-5, continued eligibility applications for programs failing to meet State-specified performance standards may be considered for eligibility at the discretion of the reviewing Michigan Works! Agency (MWA) provided the training provider can provide a sufficient reason for a program to be exempt from performance standards. **Local areas must have a policy in place for approving programs failing to meet State-specified performance standards.**

The training provider is responsible for collecting and reporting their performance data for each program they wish to have placed on the Michigan Training Connect (MiTC). All performance data must be verifiable and is subject to audit by the Michigan Department of Labor and Economic Opportunity, Workforce Development (LEO-WD). In accordance with the Act, any program failing to meet State-specified performance standards will have its ITA eligibility removed from the MiTC and will not be eligible to receive additional WIOA funding.

Local areas may require higher levels of performance for local programs than the State's minimum performance standards.

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Section 3-2: Required Performance Criteria for Continued Eligibility

To remain WIOA-eligible, a training program's performance data is required to be updated annually, and training programs may be approved or disapproved, based on their performance. Training providers are required to submit appropriate, accurate, and timely information for participants receiving training under WIOA Title I-B. The State will review provider eligibility information to assess the renewal of training provider eligibility annually.

For continued eligibility, the same performance indicators listed in Section 3-1 apply.

Local areas may require higher levels of performance for local programs than the State's minimum performance standards.

Section 3-3: Workforce Longitudinal Data System (WLDS)

Michigan was awarded two U.S. Department of Labor (USDOL) Employment and Training Administration grants to create a WLDS to link partner agencies' educational, wage, and workforce information to provide longitudinal results and feedback on a larger portion of our stakeholders.

The system currently links data from the following:

- WIOA Title I – Adult, Dislocated Worker, and Youth.
- WIOA Title II – Adult Education.
- WIOA Title III – Wagner-Peyser.
- Trade Adjustment Assistance.
- Unemployment Insurance Wage Record System.
- Secondary and Postsecondary education data via the Center for Educational Performance Information (CEPI).
- Temporary Assistance for Needy Families Program (Department of Health and Human Services – Partnership.Accountability.Training.Hope. program).
- Michigan Talent Connect and Michigan Training Connect (MiTC).
- Michigancc.net.
- Career and Technical Educational records.
- General Educational Development testing.

The linking of database records longitudinally allows comprehensive analysis of the relationship between education and training programs, the provision of employment services, and employment within Michigan.

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Section 3-4: MiTC Provider Reporting Tool

The WIOA Final Rules at 20 Code of Federal Regulation (CFR) §680.430(b)(2) & (4) states that the Governor may designate a State agency to assist in carrying out the process and procedures for determining the eligibility of training providers and programs of training services. Such agency is responsible for:

- “Ensuring that programs meet eligibility criteria and performance levels established by the State, including verifying the accuracy of the information.”
- “Taking appropriate enforcement actions against providers that intentionally provide inaccurate information, or that substantially violate the requirements of WIOA”, etc.

To ensure accurate reporting on performance for schools that do not report their program(s) via CEPI, Michigan has created an in-house tool to collect data on training programs. Schools not reporting programs via CEPI will be required to provide either the Unique Identification Code (UIC) or Social Security Number (SSN) for all students (both WIOA and non-WIOA funded) or **five (5) required elements for matching purposes** to the WD:

- First Name
- Middle Name
- Last Name
- Date of Birth
- Gender

As of 2020, training providers are responsible to submit all student exit data from the previous program year through their administration account by June 30th of each year. WD must submit this data in order to meet the requirement for reporting Second Quarter wage information in the USDOL Annual Report. The aggregated results are required to be reported to the public, and to be considered in the MiTC approval process.

Effective July of 2021, WD is responsible for reporting Fourth Quarter wage information in the USDOL Annual Report for MiTC programs for students who exited training. This information will be calculated for the exiting students served in the previous year based on the exit dates provided by the Providers. The aggregated results are required to be reported to the public, and to be considered in the MiTC approval process. WD must submit this data to meet the requirement for reporting Fourth Quarter wage information in the USDOL Annual Report.

Wages - 4th Quarter after Exit Quarter					
Exited Program During:	4th Quarter	Entire Quarter Earnings	# Exited	Total # Employed	Average Earnings
Jan. 1 - Mar. 31	Jan. 1 - Mar. 31				
Apr. 1 - Jun 30	Apr. 1 - Jun 30				
Jul. 1 - Sep. 30	Jul. 1 - Sep. 30				
Oct. 1 - Dec. 31	Oct. 1 - Dec. 31				

Training providers must **immediately** start collecting the student UIC or SSN or five (5) required elements to ensure performance data is available for the USDOL Annual Report that is due October of

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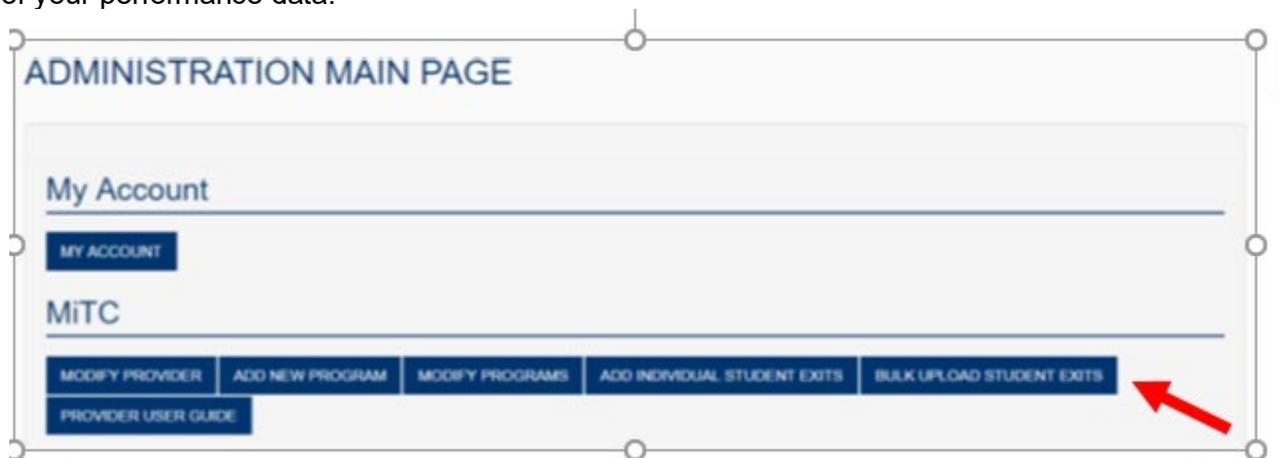
each year beginning in 2021. The training provider data collection time periods are **mandatory** and must be entered into the Provider Reporting Tool to be renewed and remain on the MiTC.

For reporting periods, the training provider must select to either provide their performance data via:

1. *Placement information screen; **or**
2. *Provider Reporting Tool.
3. CEPI Student Transcript and Academic Record Repository data collection.

Note: Training providers that do not report through CEPI must choose **either the first or second reporting method listed above***, they cannot report participant information utilizing more than one option above (i.e., 1/2 participants on placement information screen and the other 1/2 of participants through the Provider Reporting Tool). It is strongly encouraged that if you can provide the required data element(s), to report via the Provider Reporting Tool.

Training providers can find the MiTC Provider Reporting Tool on their administration main page once they are logged in. They must click on the “Bulk Upload Student Exits” button (see screenshot below), then upload their file to input performance data. Once you click on the “Bulk Upload Student Exits” button you will see a link on the right-hand side of the page called *Download Template*. This template may be utilized as a guide that identifies all required elements and those that are optional for collection of your performance data.



The student information requested includes their last day of training (Exit Date) and any Award Date. Entering an Award Date identifies that student as having successfully met the institution’s requirements for graduation/award. The Exit Date will allow the system to calculate their appropriate second and fourth quarters in the state Wage Record to supply the necessary aggregated information above - count exited, count employed, average and/or median earnings, as required.

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Section 3-5: Eligible Training Provider (ETP) Performance Reports

The ETP Performance Report, applicable to the WIOA Title I Adult and Dislocated Worker programs, must report the results of the four primary indicators of performance along with the total number of individuals who exit from the program of study with respect to all individuals who exited a program of study and all individuals who completed a program of study, including individuals in the program of study who are not WIOA participants. The USDOL has also clarified that a “program of study” approved on the ETP List is synonymous with a “program of training services” as defined in the WIOA Final Rules at 20 CFR 680.420.

Statutory requirements that mandate the collection of data through the ETP Performance Report for all individuals (both WIOA and non-WIOA students) in a program of study include:

1. The percentage of individuals who are in unsubsidized employment during the second quarter after exit from the program of study.
2. The percentage of individuals who are in unsubsidized employment during the fourth quarter after exit from the program of study.
3. The median earnings of individuals in the program of study who are in unsubsidized employment during the second quarter after exit.
4. The percentage of individuals who obtain a recognized postsecondary credential, during participation or within one year after exit from the program.
5. The total number of individuals (both WIOA and non-WIOA funded) exiting from a program of study.

For WIOA participants, the ETP Performance Report must report the results of the following participant counts and cost information indicators in the program of study:

1. The total number of participants who receive training services through the Adult and/or Dislocated Worker program, disaggregated by the type of entity that provided the training during the most recent program year and the three preceding program years.
2. The total number of participants who exited from training services, disaggregated by the type of entity that provided the training during the most recent program year and the three preceding program years.
3. The average cost per participant for the participants who received training services, disaggregated by the type of entity that provided the training during the most recent program year and the three preceding program years.
4. The number of individuals with barriers to employment served by each of the Adult and/or Dislocated Worker program, disaggregated by each subpopulation of such individuals, and by race and ethnicity, sex, and age.

Data on the ETP Performance Report must be collected in a manner so that the results for the WIOA participants may be disaggregated by the barriers to employment. An individual with a barrier to employment, as identified in the WIOA Section 3(24) includes:

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- Displaced homemakers.
- Low-income individuals.
- Indians, Alaska Natives, Native Hawaiians.
- Individuals with disabilities, including youth who are individuals with disabilities.
- Older individuals (ages 55 or older).
- Ex-offenders.
- Homeless individuals.
- Youth who are in or have aged out of the foster-care system.
- Individuals who are English language learners, individuals who have low levels of literacy, and individuals facing substantial cultural barriers.
- Eligible migrant and seasonal farmworkers.
- Individuals within two years of exhausting lifetime eligibility under the Temporary Assistance for Needy Families program.
- Single parents (including single pregnant women).
- Long-term unemployed individuals (27 or more consecutive weeks).
- Such other groups the State determines to have barriers to employment.

Local boards may supplement the criteria and information requirements established by the governor in order to support informed consumer choice and the achievement of local performance indicators. However, the local board may not do so for registered apprenticeship programs. Registered Apprenticeship programs are not required to submit performance information. If a Registered Apprenticeship program voluntarily submits performance information to the State, the State must include this information in the report.

Section 3-6: Use of ETP Performance Reports

Data collected in the WIOA ETP Performance Reports (or the data associated) is made accessible to the public via an annual report published by the USDOL. This information is distributed to workers and job seekers throughout the WIOA system, including through online formats as consistent with statute.

The ETP performance is used to collect data to assess the effectiveness of the WIOA's core programs and to monitor and analyze grantee performance. The data collection permits the departments to evaluate program effectiveness, monitor compliance with statutory requirements, and analyze participant activity while complying with Office of Management and Budget efforts to streamline federal performance reporting. If states do not adequately meet the adjusted levels of performance as described in 20 CFR 677.170, they are subject to five percent sanctions, as discussed in the WIOA Section 116(f).

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TrainingProviderResults.gov Website

Per Department of Labor (DOL) Training and Employment Notice (TEN) 9-20 issued December 15, 2020, DOL announced the availability of a new eligible training provider outcomes website, [TrainingProviderResults.gov](https://www.trainingproviderresults.gov). The site publishes the Employment and Training Administration (ETA)-9171 ETP Performance Report results submitted as part of the WIOA Annual Performance Report to a public facing website.

To support transformation to a One Workforce system, states and local areas can use data, evidence, and resulting analysis to better inform decisions and policy. This website provides greater transparency and accountability to allow customers to make data-informed career decisions about which training providers provide in-demand skills that match the customers' skills, what jobs are available, and what training is most likely to have strong employment outcomes. Customers can also compare and contrast local training providers by cost, location, and outcomes. This transparency will allow workers to find quality job training while ensuring accountability. States and local areas should strive to populate their ETP list only with training programs that are the most successful and proven and remove those providers that perform at lower levels for training customers. [TrainingProviderResults.gov](https://www.trainingproviderresults.gov) is an invaluable tool towards achieving that goal.

Additional resources for training providers may be found at [ETP Eligibility and Performance Resources](#).

Chapter 4: Licensing Requirements

As part of the Michigan Department of Labor and Economic Opportunity, Workforce Development's (LEO-WD's) quality assurance review, programs will be reviewed for compliance with applicable State licensing laws. The review will occur as part of the application process and prior to the program's submission to the Michigan Works! Agency for review and approval. The review will consider all licensing laws that may apply to any given training program. WD will remove a training provider and its programs from the Michigan Training Connect in the event a license is revoked or suspended.

Section 4-1: Proprietary School Licensure Exemption for Registered Apprenticeships

The Proprietary Schools Act, 395.101a, Section 1.q.(2)(c) exempts schools from licensure that are "A school maintained, or a program conducted, without profit by a person for that person's employees."

In general, employers or groups of employers who provide training for their own employees, or where a labor union or trade association delivers portions of the training as part of a Registered Apprenticeship program, the training program is exempt from the proprietary school licensing requirement. The key to exemption is the employer/employee relationship. If the training program is being paid for through a U.S. Department of Labor (USDOL) Registered Apprenticeship sponsor (i.e., the Registered Apprenticeship training is not funded by the Workforce Innovation and Opportunity Act grant funds), it is exempt from proprietary school licensure requirements. In other words, training would not be exempt from proprietary school licensure if the employer pays someone else to train their students. The On-the-Job training activity would remain exempt, but the "related instruction" would not be exempt if it were provided by an organization other than the employer.

While apprenticeship programs do not have to be licensed as a proprietary school if the training is paid through employer sponsorship, they must be registered with the USDOL's Office of Apprenticeship. Verification of apprenticeship sponsors can be obtained via the [USDOL's Office of Apprenticeship](#).

Without the employer/employee relationship, if the organization is teaching a trade occupation or vocation for a fee or consideration of any kind (from any party), a license is required. Simply stated, if a training program operator opens its doors to the public and charges a fee to anyone (including grant funding), then a proprietary school license is required. For additional information and requirements for postsecondary school licensing requirements, you may send general questions to their email at PSS@michigan.gov or visit their website at [LEO-Postsecondary Schools](#).

Section 4-2: Proprietary Schools

In addition to degree-granting colleges and universities which are authorized to operate in the State of Michigan, a wide range of private career schools are also available to Michigan students. Pursuant to Act 148, Public Acts of 1943, as amended, no person(s), firm, corporation, or private organization may conduct a private trade school, business, school, or institute in Michigan without first obtaining a license. Private trade schools, often called proprietary schools, offer non-degree occupational training programs which train a person for a trade, occupation, or vocation, usually including individuals beyond the high school level. In Michigan, these schools offer diplomas or certificates, rather than degrees.

Proprietary schools must be licensed by the State of Michigan. In Michigan, per statute, a proprietary school means a school that uses a certain plan or method to teach a trade, occupation, or vocation for consideration, reward, or promise of any kind. Proprietary school includes, but is not limited to a private business, trade, or home-study school.

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Proprietary school does not include any of the following:

- A school or college possessing authority to grant degrees.
- A school licensed by law through another board or department of this state.
- A school maintained, or a program conducted, without profit, by a person for that person's employees.
- A school or program within a school that exclusively provides yoga instruction, yoga teacher training, or both.

Most privately-owned organizations that offer occupational training for a fee or other considerations are legally required to be licensed by the WD Postsecondary Schools (PSS) Unit. Non-profit organizations offering occupational training are also subject to licensing requirements. A license must be granted for each site at which training is delivered, unless the school is approved to offer their programs at public assembly sites or in an auxiliary classroom.

In addition to licensure, the WD PSS Unit performs inspections of proprietary schools as part of the licensure process.

Section 4-3: Regulated Licensed Professions

Certain professions licensed under the WD PSS Unit may also include licensure examinations to measure an individual's entry-level competency in addition to training certifications or degrees from an accredited training institution prior to licensure. The Bureau of Professional Licensing (BPL) is responsible for licensing and regulating individuals who are regulated by either the Michigan Occupational Code or the Public Health Code (i.e., Health Licensing, Occupational Licensing, and Qualified Interpreters).

The mission of the BPL is to protect, preserve, and improve the health, safety, and welfare of Michigan's citizens through the licensing and regulation of occupational and health professionals. For more information regarding State of Michigan program approval and licensing requirements for various occupations and schools through BPL, please visit Michigan's BPL website at [Michigan Professional Licensing](#).

Section 4-4: Special Licensing Requirements

Schools that are headquartered in another state but offer training at a Michigan location must have the appropriate Michigan license(s).

Some special requirements also apply to schools that prepare students to enter a licensed occupation. Schools that prepare students to enter certain specialized occupations may be licensed or approved by a State of Michigan Agency other than BPL or by both BPL and another State agency.

In **addition** to proprietary school licensure by the State, there may be specific requirements that apply to schools preparing students for certain licensed occupations that are licensed through State agencies other than PSS and BPL (i.e., such as Aeronautics Schools, Electrical, Firefighting, etc.).

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Circumstances where proprietary school licensing requirements may not apply, are for some work-based training programs (i.e., registered apprenticeships, on-the-job training, customized training, incumbent worker training, internships, and paid or unpaid work experience training activities). If any of the above-listed training activities, such as customized training, are preparing students for a trade, occupation, or vocation, and the school receives compensation or award, the school meets the definition of a proprietary school and therefore, is required to be licensed by law.

Chapter 5: Public Assembly and Auxiliary Classrooms

Public Act 148 of 1943, 390.562(5) states, “A separate permit is required for each location at which instruction is offered, except a school may offer instruction at an auxiliary classroom or public assembly site without obtaining a separate permit for that location. Schools such as income tax schools that offer identical programs at multiple locations under the same management for less than six months each year as stated on the application may submit one application for all sites and pay one fee.”

Section 390.561 (c) defines “Public assembly site” as a site located in a public educational institution or located in a public meeting area suitable for instruction.

Section 5-1: State Policy

A school may hold instruction at a public assembly site and/or auxiliary classroom(s) and will not be required to hold a separate license. Schools must keep a written record of which public assembly and/or auxiliary sites they use, the dates the classes are held at these sites, and maintain copies of appropriate fire and/or safety inspection records for each site. These records must be made available to the State staff upon request.

Section 5-2: Public Assembly Site Criteria

“Public assembly site” means a site located in a public educational institution or located in a public meeting area suitable for instruction.

The following criteria will be used to determine if a school site meets the standards as a public assembly site.

1. The instructional site is not the primary site for instruction of the school; and
2. Only intermittent training is offered, and the total length of any training at one site is less than six months in a year; and
3. No school office is located at the public assembly site; and
4. The room or other space in a building must accommodate students in an instructional setting compensatory to the approved program of study, including all connected rooms and space, which share a common means of entrance and egress; and
5. Place of public assembly does not include a private family dwelling; and
6. Appropriate fire and/or health and safety inspection reports are available upon request for state inspection.

Or

7. The site is located at a public university, community college, or K-12 public school and the total length of training is less than six months in a year.

Or

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8. Instruction takes place at an employer's place of business for only employees of that employer. The facility is duly authorized by State or local municipalities to conduct business at that location. The total length of any training at one site is less than six months in a year.

Section 5-3: Auxiliary Classroom Criteria

The following criteria will be used to determine if a school site meets the standards as an auxiliary classroom.

1. The facility must only be used for instruction.
2. The room or other space in a building must accommodate students in an instructional setting compensatory to the approved program of study, including all connected rooms and space, which share a common means of entrance and egress.
3. An auxiliary classroom does not include a private family dwelling.
4. Appropriate fire and/or health and safety inspection reports are available upon request for state inspection.

Section 5-4: Inspection and Failure to Comply

Adherence to this policy is subject to on-site inspection by the Michigan Department of Labor and Economic Opportunity, Workforce Development Postsecondary Schools Unit.

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Chapter 6: Individual Training Accounts (ITAs) and Youth Programs

Section 6-1: ITAs for Youth Participants

The opportunity to earn credentials in less than two years may be attractive for at-risk or out-of-school youth, or youth with some other barrier to employment. Industry-recognized credentials that can be earned in as little as six months to two years, provide an alternative to more lengthy and costly undergraduate degrees.

The Workforce Innovation and Opportunity Act (WIOA) is silent on the use of ITAs for youth participants, but Section 681.550 of the WIOA Final Rules allows ITAs for Out-of-School Youth (OSY), ages 16 to 24 using WIOA Youth funds, when appropriate. The ITAs will benefit disconnected youth and reinforce the WIOA's emphasis on increasing access to and opportunities for this population. To the extent possible, local programs must ensure that youth participants are involved in the selection of their educational and training activities.

Section 6-2: Eligible Training Provider (ETP) Performance Reporting for Out of School Youth

The WIOA Section 116(d)(4), regarding the contents of ETP Performance Reports, mandates the collection of specific information for each program of study for each eligible provider of training services under Title I of the Adult and Dislocated Worker programs. The WIOA OSY participating in a program of study using an ITA must be reported like a WIOA Adult in the "all student" and "WIOA participant" categories. Likewise, references to the WIOA Adult program for the purposes of reporting on the ETP Performance Report include OSY participating in a program of study using an ITA.

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Chapter 7: Michigan Training Connect (MiTC) Program Audits

Section 7-1: MiTC Program Audits

Performance information for training programs that institutions include in their annual Student Transcript and Academic Record Repository Collection to the Center for Educational Performance Information (CEPI) will be processed automatically for programs matching Program Name, Classification of Instructional Programs Code, and award level. The MiTC system will calculate second and fourth quarter wage counts and aggregations.

To ensure accurate reporting on performance for schools that do not report via CEPI, (e.g., proprietary schools); Michigan has created an in-house tool to collect data on training programs, which is now available through the training provider administration main page of the MiTC. Schools not reporting via CEPI or to other administrative databases will be required to provide either the CEPI Unique Identification Code or Social Security Number for all students (both Workforce Innovation and Opportunity Act [WIOA] and non-WIOA funded) to the Michigan Department of Labor and Economic Opportunity, Workforce Development (LEO-WD). The MiTC system will calculate second and fourth quarter wage counts and aggregations.

WD has the authority to perform random audits of the data provided by training providers. When schools list or update programs, they must agree to certain assurances, including access to all records and processes used to generate program information for public listing on the MiTC. In the event of an audit, the training institution is required to provide supporting documentation to validate performance and licensing information provided by the school in cases of both initial and continued eligibility.

Since programs listed on the MiTC receive federal funds and are subject to audit, record retention is to be the longer of the federal retention requirement or their own school's retention requirement. For further information concerning federal retention requirements, refer to the Federal Office of Management and Budget's website.

As such, all training providers on the MiTC have agreed to participate in an audit process for every program listed. The primary focus of audits is to verify program performance data. Training providers are required to provide information on students' training outcomes and make available records that document and verify how students were surveyed for data, which students responded to the survey, and what data the students provided. These records will be considered sufficient to verify that schools are reporting data provided by students completing the program.

Additional program descriptive data from licensure sources such as Michigan's Postsecondary Schools Unit and/or materials published by schools may also be examined in order to determine deviation in price and length of training. This information ensures that prices posted on the MiTC are accurate and that Individual Training Account (ITA) students are not being charged at a different rate than non-ITA students.

Appendices

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General Definitions

Common Exit – Common exit occurs when a participant enrolled in multiple partner programs, has not received services from *any* U.S. Department of Labor-administered program in which the participant is enrolled to which the common exit policy applies, for at least 90 days, and no future services are planned.

Employment – Describes when an individual is working in a paid, unsubsidized job or, for Adult and Dislocated Worker program participants, working 15 hours or more a week in an unpaid job on a farm or business operated by a family member or participant.

Exit (for the purpose of performance calculations) – Exit is the last day of service. The last day of service cannot be determined until at least 90 days have elapsed since the participant last received services; services do not include self-service, information only services, activities, or follow-up services. This also requires that there are no plans to provide the participant with future services.

Participant – A reportable individual who has received staff-assisted services after satisfying all applicable programmatic requirements for the provision of services, such as an eligibility determination.

Participant Individual Record Layout (PIRL) – The data layout that provides a standardized set of data elements, definitions, and reporting instructions that will be used to describe the characteristics, activities, and outcomes of the Workforce Innovation and Opportunity Act participants.

Period of Participation – For all indicators, except Measurable Skill Gains, a period of participation refers to the period of time beginning when an individual becomes a participant and ending on the participant's date of exit from the program. For all indicators, except the Measurable Skill Gains indicator, a new period of participation is counted each time a participant re-enters and exits the program, even if both exits occur during the same program year. For the Measurable Skill Gains indicator, a new period of participation is counted each time a participant enrolls – even if both enrollments occur within the same program year.

Reportable Individual – An individual who has taken action that demonstrates an intent to use program services and who meets specific reporting criteria of the core program including:

1. Individuals who provide identifying information,
2. Individuals who only use the self-service system, and
3. Individuals who only receive information on services or activities.

Unsubsidized Employment – Employment in the private sector or public sector for which the employer does not receive a subsidy from public funds to offset all or a part of the wages and costs of employing an individual.

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Eligible Training Provider (ETP) Data Element and Collection/Coding Choices – Training Provider and Program of Service

Data Element	ETA 9171 Eligible Training Provider (ETP) Definitions	Collection/Coding Choices
Name of Eligible Training Provider (ETP)	Organizations deemed eligible by a state to provide training services to the Workforce Innovation and Opportunity Act (WIOA) Adult, Dislocated Worker, and Youth program participants.	The name of the eligible training provider.
Description of Training Provider	A short description of training provider. The description can include accreditation and program offerings/specialties.	The description of the training provider.
Address of the Training Provider	The full address of the training provider's main location, including city, state, and 5-digit zip code.	The address of the training provider. Please verify the address and zip code using the USPS address validation system .
URL of Training Program	Record the URL of the program-specific webpage for training seekers to find more information on approved training program. If a program-specific page is not available, record the URL of a list of all programs for the provider.	Leave blank if no URL is available.
Name of Training Program	The name of the approved training program.	Report the name of the approved training program.
Description of Training Program	A short description of the approved training program. The description can include other course requisites (e.g., driver's license or work experience), learning outcomes, competencies gained, program accreditation, full-time/part-time, required books/technology, and related careers.	Report a short description of the approved training program.

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Data Element	ETA 9171 Eligible Training Provider (ETP) Definitions	Collection/Coding Choices
Program of Study – by potential outcome	<p>States must ensure data is collected and reported for each program of study deemed eligible to serve the WIOA participants for each eligible training provider. A program of study is synonymous with “a program of training services” as defined at 20 CFR 680.420.</p> <p>A Program of Training Services is one or more courses or classes, or a structured regimen that provides the training services identified in 20 CFR part 680.200 and leads to:</p> <p>(a) An industry-recognized certificate or certification, a certificate of completion of an apprenticeship, a license recognized by the state involved or the federal government, an associate or baccalaureate degree, or a community college certificate of completion,</p> <p>(b) Consistent with §680.530, a secondary school diploma or its equivalent.⁶</p> <p>(c) Employment, or</p> <p>(d) Measurable skill gains toward a credential described in (a) or (b) or employment.</p>	<ul style="list-style-type: none"> • A program of study leading to an industry-recognized certificate or certification. • A program of study leading to a certificate of completion of an apprenticeship. • A program of study leading to a license recognized by the state involved or the federal government. • A program of study leading to an associate degree. • A program of study leading to a baccalaureate degree. • A program of study leading to a community college certificate of completion. • A program of study leading to a secondary school diploma or its equivalent. • A program of study leading to employment. • A program of study leading to a measurable skills gain leading to a credential. • A program of study leading to a measurable skills gain leading to employment.

⁶ Note: A secondary school diploma is defined as a high school diploma recognized by the State that is included for accountability purposes under the Elementary and Secondary Education Act of 1965. Therefore, a program of study that leads to a secondary diploma relates to the WIOA Youth program and does not qualify for placement on the MiTC.

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Data Element	ETA 9171 Eligible Training Provider (ETP) Definitions	Collection/Coding Choices
Name of Associated Credential	The specific name of certificate, certification, license, or degree participant can receive. Example: Certified Welding Inspector (CWI).	Record the specific name of the credential.
Program of Study – Classification of Instructional Programs (CIP) Code	<p>A program of study is identified through both the type of program outlined above (e.g., industry-recognized certificate) and the field of study. The taxonomy that will be used to identify fields of study will be the CIP.</p> <p>The CIP code can be found on the Integrated Postsecondary Education Data System (IPEDS) webpage.</p>	This field should represent the 6-digit CIP code, without decimal points.
Out-of-Pocket Cost: Tuition and Required Fees	Record the program’s total cost of tuition and required fees, assuming normal time to completion.	Examples include athletic center fees, technology fees, and lab fees.
Out-of-Pocket Cost: Books and Supplies	Record and estimate of the program’s total cost of books and supplies, assuming normal time to completion.	
Program Length (Clock/Contact Hours)	<p>Clock hours are the total number of actual hours per week a student spends attending class or other instructional activities that count toward completing a program of study.</p> <p>A clock/contact hour is defined as a 60-minute span of time with between 50 and 60 minutes of actual class instruction, which may include class, recitation, lecture, lab, training, or internship. No more than 1.0 clock hour can be assigned to any discrete 60-minute period.</p>	<p>Record the length of the program in clock/contact hours.</p> <p>Record 99999 if the program is a competency-based program.</p>
Program Length (Weeks)	Record the length of the program in weeks, as completed by a full-time student.	<p>Record the length of the program in weeks.</p> <p>Record 99999 if the program is a competency-based program.</p>

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Data Element	ETA 9171 Eligible Training Provider (ETP) Definitions	Collection/Coding Choices
Program Prerequisites.	Record one of the program pre-requisites for enrollment.	Prerequisites include: <ul style="list-style-type: none"> • None. • High School Diploma or Equivalent. • Associates Degree. • Bachelor's Degree. • Courses. • Combination of Education and Courses.
Program Format.	Indicate the format of the program.	Record one of the following: <ul style="list-style-type: none"> • In-person. • Online, E-learning, or Distance Learning. • Hybrid or Blended Program (both online and in-person composition).
O*Net-SOC Code Associated with Program Occupation.	Record an 8-digit O*NET Standard Occupational Classification (SOC) code for which this program prepares students. Up to 3 O*NET SOC codes can be used.	A CIP to SOC crosswalk search can be found on O*Net Online . This field should represent the 8-digit O*NET SOC code, without dashes or decimal points.

Requirements for Local Michigan Training Connect (MiTC) Policy

The Michigan Works! Agencies (MWAs) must have a local policy in place that provides the criteria for the MWA's approval of schools under both initial and continued eligibility.

- For initial eligibility, an explanation about the criteria the MWAs will use when approving schools, related to the following factors:
 - Information about whether or not the provider is in partnership with a business.
 - Other information to demonstrate high-quality training services, including whether or not the training leads to a recognized postsecondary credential.
 - Information that addresses the alignment of the training with in-demand industry sectors and occupations, to the extent possible.
- For continuing eligibility, the criteria the MWAs will use when approving schools, related to the following factors:
 - Access to training services throughout the state and rural areas through the use of technology.
 - Information reported to state agencies on federal and state training programs other than programs within the Workforce Innovation and Opportunity Act (WIOA) Title I.
 - The degree to which training programs relate to in-demand industry sectors and occupations within the state.
 - The provider's ability to offer industry-recognized certificates and/or credentials.
 - The ability of providers to offer programs that lead to postsecondary credentials.
 - The quality of the training program, including a program leading to a recognized postsecondary credential.
 - The ability of the providers to provide training services that are physically and programmatically accessible for individuals who are employed and individuals with barriers to employment, including individuals with disabilities.
 - The timeliness and accuracy of performance reports.

The local policy must also include the following information related to whether or not the MWA will:

- Set higher levels of performance than the State minimum as their criteria for local programs to become or remain eligible to provide services in that local area for placement on the MiTC. If the MWA has set a higher level of performance than the State criteria, the MWA must have a policy in place to ensure that local performance standards are applied in a consistent and objective manner.

- Request additional information from the school prior to the MWA approval, such as the name of employers involved in partnership with the training institution, additional information on the school's alignment with in-demand industry sectors or occupations, etc. If the MWA is requesting additional information, the information must be covered by their local policy.
- States are responsible for ensuring the quality and value of eligible training providers. The MWAs may include other factors to ensure quality and value, as appropriate, including and/or not limited to:
 - The accountability of providers.
 - A requirement of additional criteria and information from local providers as criteria to become or remain eligible in that local area.
 - The ability of a provider partner to partner with employers and to provide job placement services.
 - The drop-out rate of the training provider.
 - Student loan default rate of the provider.

If the MWA will be including other factors as part of the approval process, the additional factors must be identified in the local policy.

- The MiTC and its application process reflect and implement the WIOA and State-level policy. Where both State policy and the WIOA are silent, local MWA reviewers must exercise discretion. Occasions requiring the MWA to exercise discretion, and for which **a local policy is required** include:
 - Programs that do not meet local performance standards can be approved or disapproved at the discretion of the MWA. Per Training and Employment Guidance Letter (TEGL) 08-19, Attachment II, "Local boards must remove ETPs that fail to meet local performance standards (if applicable) from the local ETP list, in accordance with state and local policies and procedures. This process must allow for appeals in accordance with the state's appeals procedure for providers of training to appeal a denial of eligibility from the local list of eligible training providers. [680.480(e) 683.630(b).]"

For example, if a program fails to meet performance standards, the school may provide supplemental information that demonstrates that local economic conditions render the earnings and credentials expectations unrealistic and/or that the program serves many hard-to-serve students, rendering the completion expectations unreasonable. The MWA may request additional information and approve or disapprove the program at its discretion.
 - Programs that neither meet nor fail to meet performance standards. A program neither meets nor fails to meet performance standards if it lacks a documented track record, such as programs with cohorts lasting more than one year that can experience years in which no one graduates, and no one drops out, for which

credential attainment cannot be calculated. Similarly, if all program graduates transfer to continuing education in a related field, there may be zero graduates available for employment and therefore, wages are undefined. In such situations, the MWA may request additional information and approve or disapprove the program at its discretion.

- For schools not meeting minimum performance standards, the MWAs have the authority to consider local economic conditions and the economic and demographic characteristics of students the school serves when reviewing and approving applications for continued eligibility. Based on the school's justification for below-performance standards, the MWAs may either approve or disapprove the application. The MWAs **must have a policy in place** that identifies what the MWA will take into consideration as far as economic conditions and demographic characteristics to ensure that standards are applied consistently.
- All of the above conditions requiring the MWA to exercise discretion may also apply to initial eligibility applications. For those schools that do not meet any of the WIOA criteria for initial eligibility, the MWA, at its discretion, may require full performance data, including completion employment and wage information. In such circumstances, the reduced data requirements associated with initial eligibility do not apply.

MICHIGAN TRAINING CONNECT (MiTC) APPROVAL PROCESS TASK ASSIGNMENTS

Task	MiTC	LEO-WD	MWA
<p>Application/Initial and Subsequent Eligibility Process (Required for all programs prior to the Michigan Works! Agency (MWA) approval/state approval for placement on the MiTC).</p> <ul style="list-style-type: none"> • Conducting a quality assurance review (check for spelling, sentence structure, grammar, accuracy of information, performance information is provided, etc.). • Checking for proprietary school licensure, as applicable. • Validating that an apprenticeship training program is on the U.S. Department of Labor's (USDOL's) Registered Apprenticeship list prior to automatic placement on the MiTC and making sure all additional information that is required about the sponsor, intermediaries, method of instruction and educational provider is provided. • Making the determination as to whether or not the training is a "program of training," as opposed to an individual class or course required to be taken with other/additional classes to earn a certificate, certification, or a degree. 	X		
<p>Pre-apprenticeship training programs:</p> <ul style="list-style-type: none"> • Pre-apprenticeship training programs do not have the same automatic status as USDOL Registered Apprenticeships. • The related technical instruction portion of the training must meet all Individual Training Account eligibility requirements based on the quality assurance review (performance, proprietary school licensure, etc.). 	X		
<p>Pre-apprenticeship training programs:</p> <ul style="list-style-type: none"> • Determining that the curriculum is based on industry standards, and • That the program has at least one or more documented partnerships with a Registered Apprenticeship program to ensure individuals have the skills and competencies needed to enter a USDOL Registered Apprenticeship program (required). 			X

Task	MiTC	LEO-WD	MWA
<p>Make determination of whether or not the training being offered is actually a career service. Career services are not eligible for placement on MiTC and include the following:</p> <ul style="list-style-type: none"> • Skill enhancement, • Pre-vocational services, • Trainings with certificates that are non-occupation specific (CPR & OSHA certifications, keyboarding, off-the-shelf refresher programs for continuation of licensure, etc.), and • Programs offering Adult Education services (High School Equivalency – (GED or HiSET), Adult Basic Education, ESL, etc.). 	X		X
<p>Review of out-of-state schools (bordering states (Wisconsin, Ohio, Indiana):</p> <ul style="list-style-type: none"> • Verification that the school is on its home state’s Eligible Training Provider List. • Wisconsin schools will be approved by the Upper Peninsula Michigan Works!, Ohio schools will be approved by SEMCA, and Indiana schools will be approved by Kinexus. 	X		
<p>Review and approval of all other out-of-state schools (non-bordering states):</p> <ul style="list-style-type: none"> • Verification that the school is on its home-state’s Eligible Training Provider List. • Note: Schools located outside of the U.S. (including Canada) will not be approved for placement on MiTC. 	X		
<p>Approval for placement on the MiTC by the MWA includes making determination about:</p> <ul style="list-style-type: none"> • If minimum performance levels are not met, MWAs have the authority to make the determination as to whether or not the program will be approved. The school must provide a reason why performance levels are not being met. (Note: Failure to meet performance for two consecutive years may result in a training program’s removal from the MiTC). • The quality of the credential(s) being offered. • Whether or not the program trains for in- or high-demand occupations. • Whether or not the credentials are industry-recognized. 			X

Task	MiTC	LEO-WD	MWA
<p>Approval of distance learning programs with no physical presence in Michigan:</p> <ul style="list-style-type: none"> • Proprietary or trade schools (non-degree granting schools) with no physical presence in Michigan providing distance education to Michigan residents must be licensed as a proprietary school and must be on the Eligible Training Provider List within the state where the school's home location is based. Proprietary schools must meet all other MiTC standards including performance, with training resulting in a degree or certification. • Out-of-state colleges and universities (degree-granting) with no physical presence in Michigan need to be authorized under the Higher Education Authorization and Distance Education Reciprocal Exchange Act (2015 PA 45). • Distance learning programs located within Michigan follow the normal MiTC staff review and MWA approval process. 	X		X
<p>Removal of training programs/training providers where:</p> <ul style="list-style-type: none"> • Inaccurate information on a program(s) is intentionally provided. • A provider has substantially violated requirements under the Act. • A provider does not reapply under continued eligibility. • A provider fails to meet established performance levels under subsequent eligibility. • Substantial violation of terms outlined in a training agreement or ceasing operations prior to delivery of all training services. • Health or safety of students or others could be at risk. 	X	X	X
<p>Appeals Process (per the Michigan Department of Labor and Economic Opportunity, Workforce Development Grievance and Complaint Policy 11-37, Change 2)</p> <ul style="list-style-type: none"> • Must be within 30 days from the date of removal/denial of placement on the MiTC. • Starts at the MWA level, MWA decisions can be appealed at the State level. • State-level appeal process <i>before</i> a program is forwarded to an MWA (i.e., in the event where a provider is not approved during the <u>initial application review process</u>). 	X – State level only	X	X
<p>State Policies/Clarification of State and Federal Policies related to the MiTC:</p> <ul style="list-style-type: none"> • Establish State policy. • Review and approve local policies as needed. • Establish minimum performance levels. 		X	