



Washington State Department of  
**Labor & Industries**

# **Private Vocational Schools Collaborative Project Report**

## ***Gap Analysis, Summary, and Recommendations***

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# Executive Summary

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The Department of Labor & Industries (L&I) protects the safety, health, and security of Washington's workers and citizens. As part of this mission, the agency administers Washington's workers' compensation system, which provides benefits to workers who are injured on the job or who suffer from an occupational disease. It pays for medical treatment, partial wage replacement and provides disability benefits. For eligible workers, training for a new job or occupation (vocational rehabilitation) is also provided.

## The problem

Despite improvements made by the 2008 Vocational Improvement Project, over 50 percent of injured workers who begin a retraining plan do not complete it. For those who do complete a plan, the return to work rate is less than 30 percent.

## The project

The one-year Private Vocational Schools Collaborative Project began, in February 2016, in response to stakeholder concerns about low completion and employment rates for injured workers who attend vocational training particularly from private schools. L&I collaborated with the Workforce Training and Education Coordinating Board (Workforce Board or WTECB) on this project to:

- Assess the efficiency of private vocational schools in preparing workers to reenter the job market
- Identify gaps in the retraining process
- Recommend and/or implement solutions to address retraining gaps

Research methodologies used in this project included school visits to evaluate use of best practices, focus groups, and claim data analysis.

A project advisory committee was formed and met quarterly. Committee members included representatives from the Workforce Board, private vocational counselors, and L&I staff.

## **Assessing the effectiveness of private vocational schools (PVS) in preparing injured workers to reenter the job market. Identifying the gaps.**

There is wide variation in the quality of the training programs available to workers:

- There are a number of recognized, accepted and desirable best practices for private schools; however, our system currently lacks the basis to require that a school report or adopt them.
- The private schools that our injured workers attend most often show little or no evidence of using best practices.
- *Some* of these schools lack realistic entrance requirements. In addition, some of these schools do not objectively assess skill attainment during and upon completion of a program.

There are gaps in the establishment, available information and oversight of quality standards for private vocational schools that are not accredited.<sup>1</sup> Injured workers, vocational counselors and others do not have ready access to information about the quality, completion and employment rates of many private vocational school programs.

- Licensed schools are not required to make available completion and employment data, although this data is sometimes available for schools with programs on the state's Eligible Training Provider List.
- At the time of licensing, the Workforce Board requires schools to meet multiple requirements including providing a detailed business plan, demonstrating financial stability, and providing an overview of their curriculum and the qualifications of instructors.
- They have a regulatory process for schools who violate rules regarding unfair business practices but they do not have a subsequent focus on quality assurance beyond requiring schools to report completion and employment data, which may or may not be published.<sup>2</sup>

### Determining solutions to gaps in the vocational retraining process

L&I used the information gathered from school visits, focus group feedback, and review of injured workers' claims to help pinpoint the causes of low training plan completion and return to work rates. Information gathered during this project indicates that:

- A worker may choose a job goal without a full understanding of quality training options available. The Eligible Training Provider (ETP) list could serve as a measure of quality to help injured workers evaluate which schools and programs have the best chance of leading to a desired job. However, schools are not required to report programs and data on the ETP unless students attending that program are utilizing federal funding.
- Adopting and implementing use of the best practice guidelines for private schools, developed as part of this project, could provide workers and vocational rehabilitation counselors (VRCs) with a systematic method to compare options and evaluate quality.
- Workers with multiple barriers to reentering the workforce, as well as residual effects from their industrial injury, face specific challenges with education. Piloted use of a multiple barriers (MB) list when evaluating injured workers should be considered as part of a project involving interested vocational staff, VRCs, and some private schools utilizing best practices, including job placement services.

### Earlier Vocational Retraining for those who need it

In recent years, L&I has stepped up efforts to provide vocational services sooner after a worker is injured. While this has resulted in more workers returning to work, it also means that those eligible

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<sup>1</sup> Accreditation is not a requirement to become a licensed private vocational school. Private vocational schools referenced in this report are licensed by the state and tend to be smaller and provide focused career training in just a few areas. In contrast, larger private-sector schools and colleges are accredited by accrediting organizations recognized by the USDOE primarily for the purpose of receiving federal financial aid. [http://www.wtb.wa.gov/PCS\\_StartingASchool.asp](http://www.wtb.wa.gov/PCS_StartingASchool.asp)

<sup>2</sup> See **RCW 28C10.110 Intent**: *It is the intent of this chapter to protect against practices by private vocational schools which are false, deceptive, misleading or unfair, and to help insure adequate educational quality at private vocational schools.* See also chapter listing **WAC 490.105: Regulation of Private Vocational Schools**, including **WAC.490.105.140 Initial School Licensure Requirements** and **WAC 490.105.170Unfair Business Practices**.

for retraining begin receiving these services earlier, when motivation is higher and long-term disability may not have set in.

Although we do not have robust evidence in our system yet, we theorize that getting workers who do need training into training earlier may help improve those workers' success at completing a program and getting a job.

## Recommendations

It is essential to shift the definition of training success from a focus on plan completion alone to plan completion and finding a job. Specific recommended actions include:

- **Improve informed choice for workers:**  
Lack of access to job and completion rates hinders informed choice. To help ensure injured workers receive training that leads to a desired job, L&I should consider requiring injured workers to select education programs exclusively from the ETP list as one measure of quality. L&I should also continue to encourage workers and VRCs to use employment and labor market resources offered through WorkSource, the state's one-stop career center system, when selecting a retraining plan goal that is likely to lead to employment.
- **Ensure adoption of best practices:**  
L&I should consider requiring the schools that train injured workers to show evidence that they have incorporated identified best practices, as a means of helping ensure student success in completing the program and obtaining employment.
- **Assess the quality of schools on an ongoing basis:**  
This would apply to all schools that train injured workers. Continue to refer schools and programs that are not licensed but should be licensed to WTECB.
- **Address workers with unique and/or multiple barriers to reentering the workforce:**  
Workers with barriers to reentry to the workforce, as well as residual effects from their industrial injury, face specific challenges with education. VRCs should effectively assess each worker's strengths, abilities and needs, to ensure a good fit with a proposed program. Particularly, injured workers with limited English proficiency and adult basic education needs may not be getting these needs met fully. L&I should consider
  - Piloting use of a barriers list when evaluating injured workers.
  - Provide early access to *accredited* English as a Second Language (ESL) and *Adult Basic Education* programs.

## In Conclusion

This project has identified a number of issues that can interfere with a worker being successfully retrained and job ready. We recommend that a system be developed that requires all private vocational schools and all unlicensed or non-accredited programs that work with L&I to meet certain best practices and data reporting requirements. We further recommend the identification of effective (evidence based) practices when identifying and addressing a worker's abilities, needs and potential barriers to retraining. Finally, our system needs a better method for evaluation of training options that will lead to gainful employment.

# Introduction

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The Department of Labor & Industries (L&I) is pleased to provide this report describing the Private Vocational Schools Collaborative Project Gap Analysis, Summary and Recommendations. This study assesses training offered to injured workers who lack transferrable work skills because of their injury, and provides recommendations to address gaps in the training.

Washington's workers' compensation system provides benefits to workers who are injured on the job or who suffer from an occupational disease. It pays for medical treatment and partial wage replacement and provides disability benefits. For eligible workers, training for a new job or occupation (vocational rehabilitation) is also provided.

Since 2008, the vocational rehabilitation system has undergone substantial changes to improve vocational outcomes for Washington's injured workers and employers. The Private Vocational Schools Collaborative Project proposes to build on those improvements.

This report describes the results of the project assessment and summarizes recommendations for improvement.

# Background Information

The goal of retraining injured workers is to give them the knowledge and skills necessary to be readily and gainfully employable in the labor market. About 75 injured workers enter into retraining programs each month, with about 1,800 currently engaged in retraining.

In 2008, L&I’s Vocational Improvement Project (VIP) resulted in major changes to workers’ compensation vocational rehabilitation benefits that support training to eligible workers. These changes included extending the time for accessing training from one year to two years, and raising the cap for tuition benefits from \$4,000 to (currently) \$17,500. The VIP also increased the variety of training options available, and offered greater flexibility for workers to self-manage their training benefits.<sup>3</sup>

A worker eligible for training is assigned a vocational rehabilitation counselor (VRC) to help develop a training plan. After L&I approves the plan, the worker has 15 days to choose one of two ways to use their benefits, as shown in Figure 1 below.

**Figure 1: Comparison of training options**

Option 1	Option 2
Worker participates in approved training with oversight by a vocational rehabilitation counselor.	Worker receives a vocational award equivalent to nine months of time-loss benefits, and has access to funds for self-directed training for up to five years and the ability to use up to 10% of the retraining funds for job placement and vocational counseling services.
Claim remains open until training is completed.	Claim is closed.

Source: **Revised Code of Washington 51.21.095, Washington Administrative Code 296-19A.090 and 296-19A.110.**<sup>4</sup>

Injured workers entering a training program can attend either an accredited public or private degree granting school – usually a community college certificate program – or a licensed private vocational school (PVS) with a certificate program. While accreditation is voluntary in Washington State, community colleges are accredited per the Northwest Commission on Colleges and Universities. (NWCCU).<sup>5</sup> Private schools must be licensed, but accreditation is not required. Accreditation and

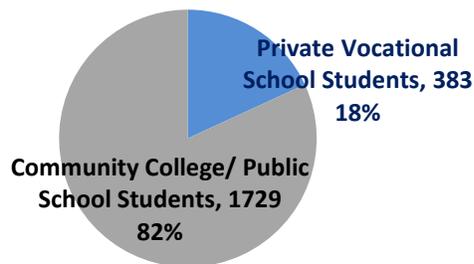
<sup>3</sup> Workers’ Compensation Vocational Rehabilitation System Annual Report to the Legislature 2014, December 2014.  
<sup>4</sup> Private Vocational Schools Collaborative Project, Baseline data, July 2016. Includes out-of-state schools.  
<sup>5</sup> State standards for quality at all state agencies including community colleges is governed by **RCW 43.17.390 Quality management, accountability, and performance system—Independent assessment**. Washington Association for Community and Technical Colleges (WACTC) and State Board for Community and Technical Colleges (SBCTC) in 2008 requested that Northwest Commission on College and University (NWCCU) accreditation would be recognized as satisfying the Washington State Quality Award standards under **RCW 43.17.390**.

licensing have different educational standards and methods for ensuring compliance. (*Appendix A: Educational standards for training schools*).

Certificate programs verify that a person has received specific education or has passed a series of tests related to a specific occupation, and meet the needs of many workers. Private vocational schools offer industry-specific programs as diverse as welding, trucking, bartending, barbering and cosmetology, construction estimator/project manager, computer technician, home inspection, realtor, manufacturing, warehousing, emergency medical technician, phlebotomy, and flagger. A worker can sometimes identify an unusual job goal such as jewelry maker with help of their VRC. Less often, a VRC may help a worker find an On-the-Job (OJT) training program. In all cases, VRCs are to ensure that there is a labor market consistent with the worker's physical abilities.

Figure 2 shows the schools chosen by injured workers found eligible for training benefits in 2015. Nearly one in five injured workers entering a training program attended a PVS. Only a few PVS show more than one or two enrollees per year. This appears consistent with previous years.

**Figure 2: Training schools chosen by L&I injured workers**



Data includes out of state schools. Data source: Labor and Industries Research and Data Services<sup>6</sup>.

According to 2012-2015 data, the average length of an injured worker's vocational plan is 528 days at a public college and 491 days at a PVS. The average cost of completing a training program was \$12,874 at a public college and \$12,500 at a PVS. Plan completion rates were 46 percent at a public college and 57 percent at a PVS. A few injured workers who attend college attain a two or four-year degree, but the majority graduate with a certificate level credential from a community college or from a PVS.<sup>7</sup>

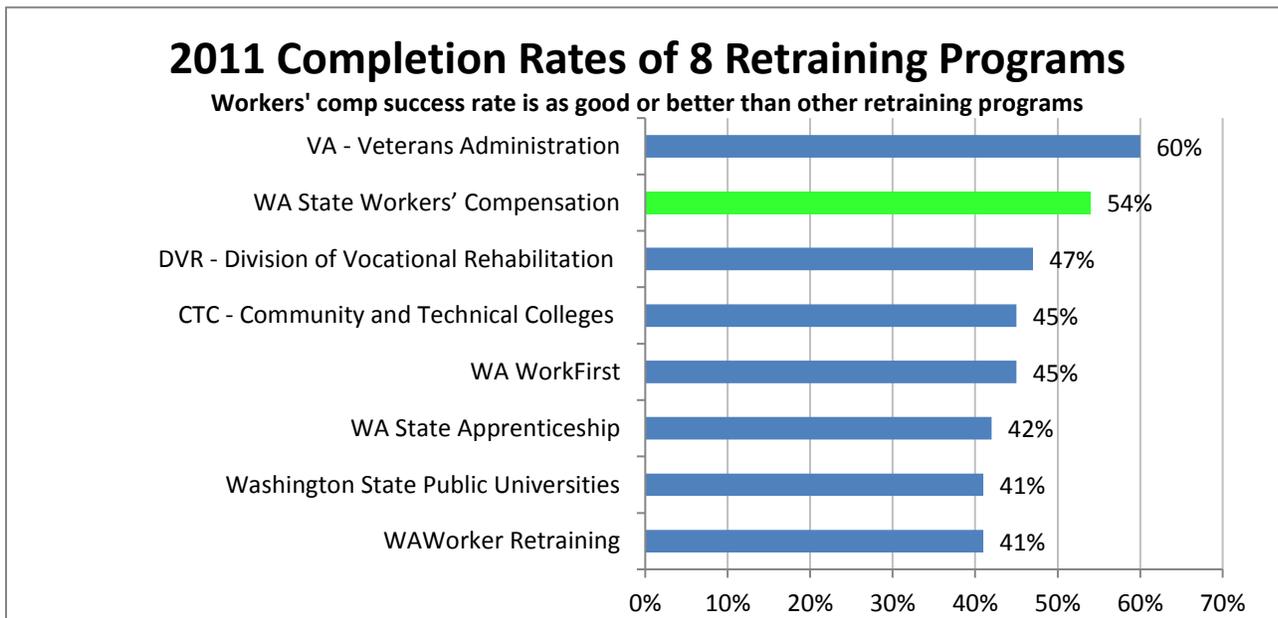
<sup>6</sup>Private Vocational Schools Collaborative Project baseline data, July 2016. Data includes out of state schools. Data source: L&I Research and Data Services.

<sup>7</sup>Private Vocational Schools Collaborative Project, Baseline data, November 2016. Data includes out of state schools. Data source: L&I Research and Data Services.

## Retraining program comparison

The overall average completion rate for retraining plans is consistently about 54 percent. Figure 3 shows these rates are comparable to or better than completion rates for other types of adult training.

**Figure 3: Comparison of retraining program completion rates**



Sources: L&I Research and Data Services. Vocational Non-Completion Plans Draft Report, August 2011, Sidse Nielson and Janice Orcutt.<sup>8</sup>

<sup>8</sup> Vocational Non-Completion Plans Draft Report, August 2011, Sidse Nielson and Janice Orcutt. Data source: L&I Research and Data Services.

# The problem

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Despite improvements made by the 2008 Vocational Improvement Project, nearly 50 percent of injured workers who begin a retraining plan do not complete it. For those who do complete a plan, the return to work rate is less than 30 percent.<sup>9</sup>

In 2011, L&I undertook a review of specific claims to evaluate vocational plan non-completion. The study posed these questions:

- What are the common reasons for plan non-completion?
- Could the plan have been salvaged?
- What worker characteristics are associated with plan non-completion?

This study found that there are multiple factors contributing to non-completion of vocational training plans. While medical factors in a claim, whether due to the accepted condition(s) or unrelated, had the largest impact on plan non-completion, grades and attendance and school changes, including access to classes, were also significant. Incidental findings showed the length of vocational plans also factored into both completed and non-completed plans. Proportionally, shorter plans of one year or less had higher success rates than longer plans. The factors that may contribute to plan non-completion fall into several categories:

- Interruption to the vocational plan that is outside the control of the injured worker<sup>10</sup>, which accounted for 60 percent of plan non-completion (when a worker meets the criteria for this reason for non-completion, the law allows them to continue with training efforts)
- Change in claim-related or non-claim-related medical status
- Opioid use
- Psychiatric issues
- Poor grades and attendance
- School changes such as dropping a class or program from the schedule

Sometimes these factors are also present in successfully completed plans. The focus of this project was to explore school-related gaps in the retraining process. We believe that developing better support for student success (via both schools and VRCs) can help impact these factors when they arise, and result in more workers completing their plans.

## Problems identifying and accessing quality educational/training programs

Post-secondary education is a complex system in and of itself. While some private vocational school choose accreditation, accreditation is not a requirement. A few PVS in our state are accredited and licensed but most are only licensed. Accreditation and licensing have different standards and methods for ensuring compliance. Public or private accredited schools generally have more

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<sup>9</sup> Data Source: L&I Research and Data Services. Research conducted as part of the Vocational Improvement Project

<sup>10</sup> A vocational plan interruption is considered outside the control of the worker when it is due to the closure of the accredited institution, when it is due to a death in the worker's immediate family, or when documented changes in the worker's accepted medical conditions prevent further participation in the vocational plan. (RCW 51.32.096(5) (b)).

information available on educational quality and outcome measures. Most public schools attended by injured workers seeking vocational training are accredited degree granting community colleges. Most programs attended by workers at community colleges are certificate level and not degree programs. All PVS must be licensed unless they fall under Workforce Boards' rules for Private School's exemption from licensing requirements.<sup>11</sup> Evaluating quality educational offerings is confusing.

### **Workforce Training and Education Coordinating Board**

Part of the mission of the Workforce Training and Education Coordinating Board (Workforce Board) is to bridge the gap between skills of graduating students and the skills employers want. For industry to thrive, workers must be properly trained and equipped with the skills that businesses require. For Washington workers to prosper, they need to be able to secure stable, living-wage jobs that can grow into lifelong career pathways. Programs that track graduates' completion, employment rates and earnings, by meeting the federal Eligible Training Provider (ETP) list baseline criteria offer one marker of quality.

The WTECB agency is governed by a Workforce Board. The state's Workforce Board includes nine voting members, made up equally of business, labor and government representatives, who regularly come together to help create a coordinated, more effective workforce system on behalf of Washington's workers and businesses. Agency staff focus on policy, planning, and strategic initiatives that make a positive impact on the system.

The agency created and maintains the Career Bridge website, a nationally recognized website that recorded over 9 million page views last year, and continues to grow. The site is used every day by jobseekers and counselors in the state's WorkSource center system and is used by middle and high school students seeking information on careers, college programs and apprenticeships in Washington, as well as ways to pay for school.

Agency research staff regularly evaluate the performance of the state's largest workforce programs, leading to further system improvements. Research staff also independently evaluate thousands of education programs for inclusion on the state's ETP list on the Career Bridge website. Staff independently evaluate completion rates, and employment and earnings for recent graduates, using student data records provided to the agency. These records are matched against wage files from the state's Employment Security Department, creating "consumer report cards" on many education programs that are then pushed out to the public via Career Bridge.

In addition to policy and research work, the Workforce Board also includes a Consumer Protection Unit that licenses and regulates private career schools that offer short-term, career-focused training, below the degree level. The Workforce Board does this regulatory work in tandem with the

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<sup>11</sup> Licensed Private Schools must design and implement programs of quality, content, and duration, and with appropriate entrance criteria, instructional materials, staff, equipment and facilities to prepare students for the program's occupational objectives. WAC 490-105-150. At the time of renewal, each licensed PVS must submit a description of programs and course offerings in accordance with **WAC 490.105.100 WAC 490.105.150**.

Washington Student Achievement Council, a state agency that authorizes private degree-granting institutions. Cosmetology schools are licensed by the state's Department of Licensing. The Workforce Board and Washington Student Achievement Council also provide regulatory oversight for veterans' training programs.<sup>12</sup>

Consumer protections for licensed schools include a student complaint process and a Tuition Recovery Trust fund, which private careers school pay into, in the event of a school closure or a complaint of unfair business practices. The Workforce Board typically licenses over 300 private vocational schools in our state, a number that fluctuates as new schools open and some close. Each licensed PVS is held to minimum standards of initial school licensure requirements as well as minimum standards of annual license renewal requirements. These requirements include providing a detailed business plan, demonstrating financial stability, and providing an overview of their curriculum and the qualifications of instructors. It is not required for PVS to be on ETP list<sup>13</sup> (*Appendix B: Workforce Training & Education Coordinating Board and Appendix C: Career Bridge and Eligible Training Provider (ETP) List*)

The Workforce Board has been tasked with management of the Eligible Training Provider list under the federal Workforce Innovation and Opportunity (WIOA) Act in our state. WIOA reauthorizes and amends the federal Workforce Investment Act (WIA). The Workforce Board partners with 14 regional Workforce Development Councils and the state's Employment Security Department, which together oversee local WorkSource offices. Those who are eligible for federal training dollars through WIOA, must choose programs from the state's Eligible Training Provider list that meet certain performance thresholds. In addition, those who receive state Training Benefits funding from the Employment Security Department to train for a new career must select programs from the ETP list. Schools that wish to be eligible for these federal and state training dollars must submit data to the Workforce Board to evaluate performance, including completion rates, employment and earnings. Participation on the ETP list is voluntary for schools and colleges, both public and private.<sup>14</sup>

Individuals often find out about WIOA benefits by visiting local WorkSource employment centers. The mission of WorkSource is to serve job seekers and employers in hiring skilled workers. WorkSource offers job seekers access to job postings and tools. WorkSource also provides assistance with skill and related assessments, resume writing, interview and job search skills, and job placement assistance. Employers get unlimited posting capacity and automatic referrals.

Injured workers have access to WorkSource assistance at one-stop service locations, through the WorkSourceWa.com website, and L&I VRCs at some locations. L&I's claim-assigned VRCs often refer injured workers to WorkSource as an additional resource. Six L&I vocational services staff are located at local WorkSource offices and two ESD WorkSource return-to-work specialists are situated within Claims Administration. (*Appendix B: Workforce Training & Education Coordinating Board.*)

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<sup>12</sup> Workforce Training and Education Coordinating Board: <http://wtb.wa.gov/WorkforceBoard.asp>.

<sup>13</sup> Workforce Training and Education Coordinating Board: <http://wtb.wa.gov/WorkforceBoard.asp>.

<sup>14</sup> Workforce Training and Education Coordinating Board, Washington Workforce Development Services System Poster. <http://www.wtb.wa.gov/WorkforceDevelopmentDirectory.asp>

## Career Bridge and the Eligible Training Provider List

Career Bridge ([www.CareerBridge.wa.gov](http://www.CareerBridge.wa.gov)) is the free state website, created and managed by the Workforce Board, which informs students and jobseekers about over 6,500 education programs including month's long training programs to one-year certificates, two-year associate's degrees, four-year bachelor's degrees, and beyond. The site also features registered apprenticeships. Career Bridge offers users data on completion and employment rates, graduates' wages, and the industries where they went to work for some schools' programs. It also offers a prospective student additional information including data on in-demand jobs, school tuition rates, and length of programs. Performance results can be found for approximately a third of the 6,500 programs listed on Career Bridge. Schools that ***choose to be evaluated for inclusion*** on the ETP list submit their data to the Workforce Board, where research staff evaluate programs for performance with the results posted on Career Bridge. As noted previously, a school is not required to report data on the ETP unless the students attending that school utilize federal or special state funding.<sup>15</sup>

In 2014, Governor Inslee adopted the most recent ETP criteria to determine training program eligibility, with thresholds set by the Workforce Board<sup>16</sup> ETP is a federal requirement from the U.S. Department of Labor under the 1998 Workforce Investment Act, and now updated under WIOA. To be entitled to federal funding through WIOA, an education program must meet performance thresholds and be on the state's ETP list. This means it meets or exceeds certain baseline performance standards for program completion, employment, and earnings. The ETP standards are described in *Appendix C: Career Bridge and Eligible Training Provider (ETP) List*<sup>17</sup>

L&I rules require workers to obtain vocational training at a licensed or accredited school. They set stringent exception criteria for unlicensed or non-accredited programs. In 2015, L&I worked with the Workforce Board on rule changes to benefit injured workers and other agency-sponsored students of PVS. Some licensed schools that in the past focused exclusively on recruitment of injured workers were considered community-based, and were exempt from regulations and data submission. The revised rules aligned the policies of the two agencies. Agency-sponsored students from L&I and the Department of Vocational Rehabilitation are now covered by the Workforce Board's consumer protection regulations. However, L&I rules do not require VRCs to use ETP-listed programs.

Despite these improvements, complaints, investigations, and other stakeholder feedback indicate *some* private schools may not be delivering the quality education and job preparation our vocational system needs. Stakeholder complaints were almost exclusively about licensed schools rather than public (state) or private accredited institutions.

Historically, L&I had not focused on assessing or monitoring the quality of education and job preparation provided by PVS. The U.S. Department of Education regulates accreditation of training

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<sup>15</sup> Workforce Training and Education Coordinating Board: <http://wtb.wa.gov/WorkforceBoard.asp>.

<sup>16</sup> Current thresholds adopted by the Workforce Board for programs to be on the state's Eligible Training Provider list are 20 percent completion, 50 percent employment rate and \$3,943 in a calendar quarter (three month period) or \$10.64 per hour. See Appendix C: Career Bridge and the Eligible Training Provider (ETP) List for more detailed information.

<sup>17</sup> Workforce Training and Education Coordinating Board, Eligible Training Provider Performance Policy: <http://www.wtb.wa.gov/Documents/Tab3-ETPLS>.

programs. Other rules on program quality and integrity are complex and do apply to either licensed private vocational schools and programs or non-degree programs at community colleges. Accreditation standards have been in the news lately with the decertification in June 2016 of Accrediting Council for Independent Colleges and Schools (ACSIC) and the recent closure of ITT Technical Institute campuses in many states. Measures of cost and quality education remain at the heart of federal regulations. Federal scrutiny on quality education has focused on student loan debt-to-earnings ratios. Injured workers do not take on student debt, but have an equal need to use their vocational benefits for quality education and skill attainment.<sup>18</sup>

Questions on the role of quality post-secondary education are not limited to our state. A recent article outlines the current controversy over whether a public school or private school certificate guarantees a higher salary based on recent U.S. Department of Education data.<sup>19</sup> Further regulations, modification of existing regulations and clarification of program integrity rules may be forthcoming at the federal level in the near future. The U.S. Department of Education has recently released a second set of gainful employment rules setting a baseline for schools with the intention of capturing the majority of poor performing programs through scrutiny of graduates' employment outcomes compared to amount of student debt. Along with gainful employment, distance education standards are currently in development.

### **Gaps in the retraining process when evaluating PVS**

Gaps exist in the establishment, available information about, and oversight of quality standards for private vocational schools that are not accredited. Injured workers have a guaranteed amount of educational benefits to expend for post-secondary training programs at a community college or at a PVS, but no systematic way to compare programs. An ETP-listed program is required for WIOA funding, but is not required for workers' compensation vocational retraining. There are a number of additional recognized, accepted and desirable best practices for private schools (see Figure 5 on page 32); however, our system currently lacks the basis to require that a school report on or adopt these best practices.

VRCs assess each worker's strengths and needs in an effort to match them to the best program, but this does not make up for the lack of standard markers of quality. The Workforce Board Consumer Protection Unit licenses and regulates PVS, but does not provide quality assurance for licensed schools. There are minimum standards<sup>11</sup> that each school must follow to renew their license each

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<sup>18</sup> **For Profit Schools Seek Reprieve on Gainful Employment Rule from Inside Higher Education, April 16, 2016, and Public Sector Certificates Result in Higher Earnings than Those from For Profits**, Andrew Kreighbaum and Ashley A. Smith, <https://www.insidehighered.com/news/2016/11/18/education-department-releases-gainful-employment-data-vocational-programs>.

<sup>19</sup> *Inside Higher Education*, **Andrew Kreighbaum and Ashley A. Smith, November 18, 2016**: "Earnings data the U.S. Department of Education released Thursday show that graduates of certificate programs at public institutions earned nearly \$9,000 more than graduates of those programs at for-profit colleges. The colleges. The department will use the new numbers to enforce its gainful employment rule, which was finalized in 2014 and seeks to measure whether a sufficient number of graduates of vocational programs can repay their federal loans. The data also showed a wide range of variation in earning outcomes depending on a graduate's field of study. That variation partly explains the difference in earnings between certificate holders who attended public and for-profit colleges. Those who attended higher-earning certificate programs were more likely to have attended a public institution, such as a community college."

year and there is a student complaint process for unfair business practices. Some of the private schools that workers attend most often show little or no evidence of using best practices. Examples of some of the problems needing to be addressed included non-accredited English as a Second Language (ESL) instruction; nonstandard (or non-existent) entrance requirements and examinations; lack of objective skill assessment during and upon completion of training and non-accredited online distance education.

### **PVS recruitment of injured workers**

L&I requires a school or training provider to have admission open to the general public; however, some of the private schools that our workers attend most often have focused their recruitment solely on injured workers. It appears that some PVS have promoted general and computer front-office job training to VRCs as meeting special needs of injured and disabled workers. Some of these schools offer bilingual instruction in Spanish, GED preparation, and offer a slower pace and less daily class time tailored to a specific student. Entrance requirements for and the type of special services provided to workers are not always clear. Extended length of a program is sometimes the only offering based on a determination of special needs of the injured or disabled student's abilities. This approach is not consistent with many private schools, or with the public school approach. Most schools rely on remedial preparation prior to a program, rather than adjusting the program length.

This is distinctly different from the approach at most public and many private schools, where the curriculum and program length is set and a student qualifies for it or they do not. The potential problems from these approaches include putting a worker into a program where they may not be successful and the possibility of a school "accepting everyone" for financial gain. It is important to note that most of the complaints and concerns about worker training that were identified during this project are about one or more of the private schools that are most often attended by our workers. Complaints about other private schools and public schools are much less frequent.

### **In-demand jobs**

Choice of job goal may be restricted by availability of training as well as by the labor market. In rural locations, training options can be more limited for all job goals. Distance learning (web-based learning) is a relatively new and growing approach that may fill this gap for some.

Two job types, general office clerk and truck driving, provide examples of the options available for popular "in demand" jobs. Truck driving requires a worker to obtain a specialized license. General office work does not have that requirement. (See *Appendix C: Career Bridge and Eligible Training Provider (ETP) list; Figure 6, Career Bridge website information Trucking certificate.*)

A worker looking at a commercial driver's license (CDL) Class A trucking job may be comparing different PVS programs with community college programs. CDL training is usually on-location training. All CDL schools are licensed by DOL and the Workforce Board and their curriculum and hours of training is approved by DOL. In contrast, online (distance learning) is a growing option for some retraining programs such as general clerk or receptionist. There is no easy way to compare

similar certificate programs at a community college, for an apprenticeship, at a small trade-oriented vocational school or at a larger PVS. In addition, some trade schools, such as those with trucking programs, include a higher standard of curriculum review by the Department of Licensing. Without an easy means or singular tool or method to evaluate curriculum quality, program length, and cost of tuition, choice of the right school may be merely a best guess rather than an informed choice. Detailed information about currently existing resources to help workers make these determinations is in *Appendix C: Career Bridge and Eligible Training Provider (ETP) list*.

### **Worker motivation and participation**

Worker motivation and participation play an important role in successful training plan completion, and both may be affected by the lack of tools for workers to evaluate training program options. Claim review information shows expectations about schooling may change as a vocational plan progresses. Many injured workers beginning vocational training show a high degree of interest and positive expectations. Some injured workers reported altered expectations at the end of the process, even when finding a new job. Some certificate programs offer active and often successful job placement services, while others offer none.

In addition to worker motivation, worker understanding of training program expectations for progress, attendance, and other factors key to successful participation is critical to successful completion of training. These expectations are defined in statute. Since failure to abide by these rules can result in suspension of benefits, a worker who does not understand the system and/or has unaddressed barriers is at risk of training plan non-completion.

# The project

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The Private Vocational Schools Collaborative Project began in February 2016 in response to concerns about low completion and employment rates for injured workers who attend vocational training. L&I collaborated with the Workforce Training and Education Coordinating Board (Workforce Board) on the project to:

- Assess the effectiveness of private vocational schools in preparing injured workers to reenter the job market
- Identify gaps in the retraining process
- Determine solutions to address retraining gaps

Research methodologies for this project included school visits to evaluate use of best practices, focus groups, and review of 2015-2016 claim files with completed and uncompleted proposed plans.

## **Assessing the effectiveness of private vocational schools in preparing injured workers to reenter the job market**

As part of the Private Vocational Schools (PVS) Collaborative Project, L&I in conjunction with the project advisory committee developed best practice guidelines for private vocational schools. Best practices describe standards for policy, ethical management and administrative operations for post-secondary schools. The best practice guidelines shown in Figure 4, while not all-inclusive, represent desirable best practices at certificate programs under consideration by prospective injured workers. Some of these best practices are part of licensing standards and many are included in accreditation standards. These best practice guidelines were used in the project as a starting point to assess the effectiveness of private vocational schools.

**Figure 4: Private Vocational Schools Collaborative Best Practice Guidelines**

Training program component	Best practices
Faculty qualifications	Faculty members are certified or licensed where required by law. Administrators meet minimum qualifications.
Admissions/Institutional policies & practices	Schools are open to the public. School admission criteria/policies are to admit only students capable of benefit.
Ability to Benefit assessment	<ul style="list-style-type: none"> <li>• Entrance exams are specific to the type of industry certificate/program and evaluation of skills and abilities.</li> <li>• School is required to document HS diploma or GED and use of admissions test in lieu of diploma.</li> <li>• Standard Ability to Benefit Exam (ABE) is used with third-party standards for non-high school diploma/GED.</li> </ul>
Industry or employer-based curriculum for non-degree programs (if offered)	<ul style="list-style-type: none"> <li>• Program evaluation: Includes a process for systematic and evidence-based evaluation.</li> <li>• Program organization and length: Curriculum is focused on occupational requirements.</li> <li>• Curriculum planning: Includes evidence-based process and external validation/defined standards.</li> <li>• Externships are offered in bona fide occupational settings and planned with criteria and timeline.</li> </ul>
Student protection and success standards	<ul style="list-style-type: none"> <li>• School infrastructure is appropriate to mission and regulatory requirements.</li> <li>• Student assessment and complaint processes are defined, and employment assistance and job readiness assistance are provided.</li> <li>• Credit/degrees/certificates require documented achievement replicating higher education norms.</li> <li>• Student success defined. EX: through coach/mentor process and separate faculty/department focus.</li> <li>• School discloses standards via catalog, enrollment agreement, student progress updates, etc.</li> </ul>
Student achievement and institutional purpose	<ul style="list-style-type: none"> <li>• A published mission or purpose specific to achievement informs all aspects of institution.</li> <li>• Student educational achievement is assessed systematically with faculty involvement.</li> <li>• Completion rates are tracked and there is ongoing attention to retention and completion rates.</li> </ul>
Learning outcomes and skill attainment	<ul style="list-style-type: none"> <li>• Skill attainment and assessment of student progress are defined prior to the training start date.</li> <li>• Entrance exam is specific to the type of industry certification or program.</li> </ul>
Distance education program standards (on-line programs or schools)	<ul style="list-style-type: none"> <li>• School demonstrates distance education methodologies (equivalent to similar type programs) for management, administrative, capacity, equipment, facilities, technology, verification/privacy, and employment outcomes.</li> <li>• Pre-admission and post admission standards are defined.</li> </ul>
Standards for addressing Limited English Proficiency (LEP) students	<ul style="list-style-type: none"> <li>• School has LEP standards and tracks LEP student success.</li> <li>• Instruction is conducted primarily in English by a certified Teaching English to Speakers of Other Languages (TESOL) instructor.</li> <li>• Students complete ESL in front-loaded courses prior to career-oriented training or integrated courses with which ESL is taken concurrently.</li> <li>• Students enrolled in ESL courses are tested in English proficiency prior to start and end of the program.</li> <li>• A qualified third-party test administrator administers tests. Normed tests are used (Test of English as Foreign Language or (TOEFL) or Test of Written English (TWE)). Results are measured.</li> </ul>
Available employment and student completion data/information	<ul style="list-style-type: none"> <li>• Accredited (only) student outcomes meet federal requirements at certificate level.</li> <li>• School discloses graduation and graduate employment rates for each program.</li> <li>• Licensed school programs meet Eligible Training Provider (ETP) requirements; OR School publishes student data and meets L&amp;I WAC requirements for job placement.</li> </ul>

## **School visits – a tale of four schools**

To assess PVS effectiveness, L&I staff visited 15 private vocational schools around the state to consider each school's use of best practices. L&I found varying degrees of best practices at the schools visited. Four PVS are highlighted below:

A small Commission on Accreditation of Rehabilitation Facilities (CARF) non-profit school in Renton that offers forklift and other warehouse industry training focuses on a small student body and individually tailored hands-on and classroom training. CARF accreditation standards help ensure participation and foster motivation of students. The school's primary instructor was in the warehouse business locally for a number of years, and taught standards and safety as part of both classroom and one-on-one instruction. Facilities were small but professional.

A small PVS in Vancouver, although not currently taking private pay students, offers training in soldering with robust job placement services. The school has small but professional facilities with a classroom geared to hands-on instruction. Staff met one student who was visually impaired and proud of his skills in building circuit boards and his success in the classroom; the instructor discussed how he modified the way he presented information in order to foster this student's success. This school has a separate website for employers highlighting its graduates. Due to trade requirements, all graduates must pass skill-based exams for eventual certification.

A PVS in the process of being licensed in Kennewick is shifting its focus from continuing education of Hanford workers to training injured workers in office skills, which does not require certification for specific trade-based skills for graduation. The owner is building upon Information Technology certifications and knowledge of local employers to design a curriculum that uses grades and exams rather than a pass/fail approach based on time spent with an instructor.

One school uses primarily distance learning to teach a number of programs. It provides a "full package" for accessing online instruction from a worker's home, including loan of a computer and internet access for each student. Student course work is self-paced and review is pass/fail. Online instructor time is monitored by the school and student time spent on any given day is flexible. This PVS showed the highest volume of worker attendance in 2015 of any other PVS (147 L&I students) and of most similar community college certificate programs in general office and medical office. This school declared its mission as working with the most difficult-to-place students. However, they can provide no evidence of where their graduates are going to work. Program completion rates are high; however, job placement rates are not tracked. The school has reported up to a 95 percent completion rate.

These four schools are examples of the significant variance in the type and format of retraining, as well as the adoption (or lack of) of best practices. Of the 15 schools visited, some offer an industry-based curriculum that includes hands-on and classroom instruction, flexible ample one-on-one instruction, and robust assistance with job placement. PVS standards vary widely, and many are not as clear or consistent as the four schools described.

Of the 15 schools visited, at least three did not have standard entrance exams and appeared not to turn away students for any reason. Standards were difficult to determine and student progress depended on instructor evaluations and the amount of time spent by the student. These schools emphasized worker motivation as the key to success. Some programs included no grades and a pass/fail approach, with most students graduating. Schools with students attending distance education programs appeared to vary widely in educational standards, models and offerings. Accredited distance learning programs appeared to utilize higher standards for student admittance. Some PVS offered ESL incorporated into the vocational training, but did not have certified ESL instructors. Only one PVS was addressing this issue with intent to design a certified ESL program in the near future. Another PVS used a bilingual instructor and a software package for learning Spanish that can be purchased by the public. Job placement services ranged from robust to informal to none.

### **Identifying customer expectations**

A 2013 research article by University of Washington (UW) researchers indicated that workers had significantly higher hopes at the start of vocational planning than at the end of vocational training. One reason for this dissatisfaction may be that programs for available postsecondary education, once started, do not meet initial expectations. This may be due, in part, to a lack of worker knowledge about the differences in training programs.

Two L&I Vocational Service Specialists (VSS) at WorkSource were interviewed about their guidance for injured workers regarding PVS. One counselor said she routinely asks a customer to call prospective employers regarding the desired job goal and ask employers about their confidence in a particular certificate, whether from a community college or PVS. It is not clear whether this is a standard practice with most vocational counselors.

The findings and recommendations from the University of Washington research are consistent with some of the findings and recommendations of this project. The UW researchers' suggestions for addressing issues related to the knowledge gap are:

- Provide more training choices and more worker input into training goals to ensure a better fit with the worker's experience and abilities.
- Listen to and respect a worker's goals, interests and limitations.
- Provide more help with job placement, reentry skills, and return to work.

### **Focus groups – Stakeholder perceptions**

To gain perspective on worker retraining from a broad variety of stakeholders, L&I gathered customer input. Focus group participants included workers' attorneys, vocational counselors, claim managers, vocational services counselors, and audit and dispute resolution staff. All focus groups shared similar key messages, which are reflected in the following summary of feedback:

#### *What's working?*

- Some schools have strong graduation-to-job transition rates and resources.

- Certificates from PVS that partner with local employers to identify desirable skills are seen as valuable by employers in the labor market.
- PVS that offer job counseling, placement help and resources for oversight of skills progression and job placement are viewed more positively.
- PVS that are smaller can offer greater program flexibility or tailor a program to a specific injured worker/student's needs.

*What's not working?*

- PVS that "graduate" and simply pass students without validation of attainment of proper skills and have low job placement rates do not work well for student success.
- Schools whose curriculum is not aligned with (local) industry needs have low job placement rates.
- PVS that provide no information or access to job placement rates for graduates are considered a problem.
- We have no way to know what skills are being taught prior to a worker taking a course, and no way to determine what skills a worker has acquired after graduation.
- Schools with income primarily from L&I, those with tuition that may be viewed as excessive tuition, and those that appear to focus on profit rather than student success received negative feedback.
- Distance learning (online course work) had both positive and negative feedback. There was agreement that these schools work better for some students but not for others.
- Schools that did not provide adequate information about quality standards for distance learning programs were considered troublesome.
- Coursework identified as ESL that does not meet ESL standards
- Lack of standard entrance examinations.

*What should the future look like (solutions)?*

- Focus on return to work outcomes in addition to plan completion.
- Engage injured workers in an entire step-by-step process, including: 1) identification of desired skills, 2) identification of strengths, and 3) early resume and job search activities, as well as at the end of the training plan. Include choice of school or program in this process.
- Offer VRC job placement assistance upon completion of the training plan in coordination with the school or training program.
- Data-track PVS for job placement and training plan completion rates. If an ETP list is made mandatory, make sure there are enough choices available to all injured workers.
  - Provide more targeted focus in the vocational retraining system tailored to injured worker needs, especially for those with barriers such as LEP or psychological barriers.

- Provide coaching in soft skills, and resources focused on job search and job placement. Soft skills include instruction in job readiness including dressing for the job, appropriate email communication, varied workplace culture expectations, and time management.<sup>20</sup>

The focus groups consisting of workers' attorneys agreed that a pension for an injured worker often equates to a psychological setback and lost opportunity. Although it is in the best interest of most workers to return to skilled employment, delays in training, stopping and starting a different program, incomplete understanding of available choices and assessment of student need and other missed opportunities affect motivation. VRCs and claim management staff confirmed these messages. VRCs added that some PVS offer easier access and provide easier methods of communication with instructors for lower academic profile students.

VRCs and claims staff were concerned about:

- lack of standards for ability to benefit assessments and/or entrance exams done by the schools,
- lack of standard markers of success, and
- ESL classes/training not offered by a certified ESL instructor or at an accredited ESL program.

Workers' attorneys echoed these same concerns. Some PVS said that they want to help workers with multiple barriers to workforce reentry, but were concerned that their school would be blamed if a student did not succeed.

Other feedback indicated that a "cookie cutter" or "one size fits all" approach hampers success. Stakeholders recognized the need to keep what works for most in the system while also addressing the needs of some workers with multiple barriers to reentering the workforce.

### **Review of injured worker claims**

Claim file review was done on proposed vocational plans to gather more information about barriers to reentering the workforce. Specific examples of problems with educational quality were found at a number of schools for injured workers with multiple barriers to workforce reentry. These student barriers, which may not have been addressed fully at some schools, included limited English proficiency and literacy issues. These issues in particular may have added to students' fears or affected students' ability to pass entrance exams such as those used at community colleges. Standard exams are used in all accredited schools to assess math and verbal/written literacy at or below the 9<sup>th</sup> grade and 12<sup>th</sup> grade levels. Students who do not pass these exams are first required to take remedial education classes for no credit before progressing to a certificate level or degree level program of study. These workers often selected a PVS that offered a nontraditional classroom, hands-on learning, and one-on-one instructor time and no standard entrance exam. Programs that were less than full time and distance learning programs were popular.

A second type of case file review was done on state fund claims from 2012-2015 with both completed and non-completed vocational plans. This review used a methodology similar to the one

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<sup>20</sup>Private Vocational Schools Collaborative Project Focus Group notes, November 2016.

used in the 2011 claim review study for consistency. It found similar issues around lack of entrance exams and potential student need for adult basic education, LEP, as well as issues with lower standards for non-accredited distance learning. This review included a sample of successfully completed plans for comparison, with a particular focus on school-related issues including grades, attendance, and access to courses.

Findings revealed that workers who had multiple barriers to reentry to the workforce as well as residual effects from their industrial injury faced specific challenges with education. Multiple barriers might include LEP, lack of a high school diploma or GED, over 10 years since their last formal schooling, literacy issues below an 8<sup>th</sup> grade level in writing, lack of basic computer or math skills, opioid use, a psychological diagnosis, or a singular work history in the heavier trades. Many of these workers chose a PVS over community college. The lack of standard entrance exams and information on job placement and training completion rates when evaluating a PVS certificate program remains an additional barrier to all.<sup>21</sup>

## **Determining solutions to retraining gaps**

L&I used the information gathered from school visits to assess best practices use, focus group feedback, and review of injured workers' claims to identify the causes of low training plan completion and return to work rates.

Information gathered during this project indicates that:

- Lack of injured worker access to information about training programs' completion rates and job placement rates hinders informed choice, which ultimately contributes to lack of motivation. The ETP list could serve as a measure of quality to help injured workers evaluate which schools and programs have the best chance of leading to a desired job.
- A worker may choose a job goal without a full understanding of quality training options available. Adopting and implementing use of the best practice guidelines for PVS that were developed as part of this project could provide workers and VRCs with a systematic method to compare options and evaluate quality.
- Workers with multiple barriers to reentering the workforce, as well as residual effects from their industrial injury, face specific challenges with education. Piloted use of a Multiple Barriers (MB) list when evaluating injured workers could be done as part of a pilot project involving interested vocational staff, VRCs and schools. The pilot would also incorporate use of psychosocial assessment to determine where the worker is at in their perceptions of school success and ways of addressing barriers that have surfaced. Each worker with multiple barriers should be matched to the best school or program following Best Practices Guidelines.

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<sup>21</sup> Private Vocational Schools Collaborative project 2<sup>nd</sup> Set of Eyes and Vocational Plans Claim File reviews and 2012-2015 Completed and Non-Completed Vocational Plans Claim File Reviews. Data Source: L&I Research and Data Services.

# Recommendations

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L&I should address the lack of a simple measure of quality for certificate programs and require the use of Best Practices guidelines and the ETP list. If a program is not on the ETP list with documented completion and employment data, the VRC should explore a program's best practices based on worker need with particular emphasis on job and completion rate data and job placement services. By doing so, L&I will align itself with other federal and state standards. L&I should also continue to refer to the Workforce Board schools and programs that are not licensed but should be licensed.

In addition, we need more information and a systematic way to identify workers with multiple barriers to reentering the workforce. These workers should attend training programs with higher standards than those currently required at non-accredited schools, including accredited courses or instructors for ESL, accredited distance learning, and normed ability to benefit assessments or entrance exams.

These recommendations can help ensure that injured workers are receiving quality education that leads to a job.

## Next steps

It is essential to shift the definition of training success from a focus on plan completion alone to include data on completion coupled with finding a job. Specific recommended actions include:

### Improve informed choice for workers

Lack of access to job and completion rates hinders informed choice. To help injured workers evaluate which schools & programs have the best chance of leading to a desired job, L&I should require use of the ETP list by vocational counselors as a baseline proxy measure of quality.

### Adopt best practice guidelines

A worker may choose a job goal without a full understanding of quality training options available. To provide workers and VRCs with a systematic method to compare options and evaluate quality, L&I should adopt best practice guidelines to include consultation with WorkSource.

### Continually assess use of best practices

A commitment to using best practices is a commitment to using all the knowledge and technology at one's disposal to ensure success. In addition to ensuring that licensed schools that train L&I workers adopt best practices, L&I should evaluate best practices at unlicensed and non-accredited vendors applying to train injured workers by:

- Updating criteria for unlicensed or non-accredited schools to be consistent with best practices when these vendors reapply every two years.
- Continuing to refer to the Workforce Board those schools and programs that are not licensed but should be licensed.

### **Address workers with multiple barriers to reentering the workforce**

Workers with multiple barriers to re-entry to the workforce, as well as residual effects from their industrial injury, face specific challenges with education. Multiple barriers might include LEP, lack of a high school diploma or GED, opioid use, over 10 years since their last formal schooling, literacy issues below an 9<sup>th</sup> grade level in writing, lack of basic computer or math skills, a psychological diagnosis, or a singular work history in the heavier trades.

VRCs assess each worker's strengths and needs, but should pair this assessment with standard markers of quality in certificate programs. Some workers with multiple barriers to reentering the workforce need higher standards for ESL, ability to benefit exams and school entrance requirements, and distance learning. L&I should pilot use of a barriers list when evaluating injured workers.

L&I should require accredited ESL and standard ability to benefit/ entrance exams for injured workers, especially those demonstrating student need in the area of limited English proficiency and adult education. Vocational counselors should more fully evaluate non-accredited online or distance learning programs for students with multiple barriers to ensure student needs are fully addressed. A pilot project involving interested vocational staff, VRCs, and schools should be implemented to address student need for workers with additional barriers.

# Conclusion

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This project has identified a number of issues that can interfere with a worker being successfully retrained and job ready. We recommend that a system be developed that requires all private vocational schools and all unlicensed or non-accredited programs that work with L&I to meet certain best practices and data reporting requirements. We further recommend the identification of effective (evidence based) practices when identifying and addressing a worker's abilities, needs and potential barriers to retraining. Finally, our system needs a better method for evaluation of training options that will lead to gainful employment.

# Appendix A: Educational Standards for Schools

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## Accreditation

The Higher Education Opportunity Act specifically protects students against poor quality education:

### SEC. 123 Diploma Mills

- (1) Prevent, identify, and prosecute diploma mills; and
- (2) Broadly disseminate to the public information about diploma mills, and resources to identify diploma mills.

### SEC 103 ADDITIONAL DEFINITIONS

(20) The term “diploma mill” means an entity that

(A)(i) offers, for a fee, degrees, diplomas, or certificates, that may be used to represent to the general public that the individual possessing such a degree, diploma, or certificate has completed a program of postsecondary education or training; and (ii) requires such individual to complete little or no education or coursework to obtain such degree, diploma or certificate; and

(B) lacks accreditation by an accrediting agency or association that is recognized as an accrediting agency or...<sup>22</sup>

Accreditation upholds education standards per requirements of the 2008 Higher Education Opportunity Act. Accreditation is required for most degree-granting schools, and is done by regional or national accrediting bodies recognized by the U.S. Department of Education. Schools that offer degrees but do not choose accreditation are not eligible for federal aid, including student loans. Some non-degree granting, licensed schools can receive specialized accreditation from nationally recognized accrediting bodies designed around professional organizations. Registered nursing is one example of specialized accreditation.

The accreditation process encourages schools to become stronger institutions by setting and following standards of educational quality, i.e., “best practices.” The accreditation process is costly. Implementation may be challenging, as shown by the 2016 decertification of Accrediting Council for Independent Colleges and Schools (ACSIC) and subsequent closure of ITT Technical Institute in many states.

The Washington Student Achievement Council (WSAC) enforces accreditation at the state and college level, concentrating on student success. WSAC partners with the Workforce Training and Education Coordinating Board (WTECB) on accreditation for training offered at public and private degree-granting schools.

## Licensing

Licensed schools offer only certificate programs and are required to follow standards for policy, ethical management, and administrative operations at the post-secondary level. The goal of the state

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<sup>22</sup> Higher Education Opportunity Act of 1965 amended 2008, (Public Law 110-315).

licensing process is quality education and consumer protection for the prospective student. The majority of PVS are licensed schools. Licensing PVS at the state level reflects the same intent as U.S. Department of Education accreditation of degree-granting public and private colleges and universities at the federal level.

The regulatory process for licensed schools is similar to, but does not mirror, the accreditation process for degree-granting schools. Both the accreditation process and the state licensing process set forth essential standards of quality against which a school and specific course or program of study is measured. The licensing process guarantees schools meet standards for financial stability, adequate and qualified staffing, and quality of career-focused programs.

The Workforce Board's Consumer Protection Unit regulates licensing of private schools in our state, with some exceptions. The unit licenses about 330 private schools, collects student data annually, investigates student complaints, and administers Tuition Recovery Trust Fund (TRTF). The Consumer Protection Unit also contracts with the Department of Veteran's Affairs as a State Authorizing Agency (SAA).

Because some industries require certification or a license for a profession, such as home inspector, other state agencies and federal regulations may mandate additional standards. The Department of Licensing (DOL) regulates licenses for truck drivers and for cosmetologists. The Department of Social and Health Services (DSHS) regulates licenses for certified nursing assistants. Other examples include acupuncture, massage therapy, emergency medical technician, medical assistant, animal massage, commercial truck driving, long-term care and maritime programs. These programs must meet requirements of agencies such as the Department of Health, DOL, DSHS, and Department of Homeland Security.

## **Certification**

Some public and private degree-granting institutions offer certificate programs, which certify that a person has received specific education or has passed a series of tests related to a specific occupation. Some of these programs require the graduate to obtain a license or certificate to work in the trade or profession and others do not. Community colleges offer many certificate programs as well as associate degrees.

There is no one standard performance measure required for certificate-level programs. Although licensed schools are required annually to submit data on all students as part of the licensing process, program performance data is only available for schools with programs that are on the voluntary Eligible Training Provider (ETP) list. Licensed schools are not required to make job and completion data available to prospective students. The ETP list provides independent verification of employment and earnings, and completion rates, for programs that receive federal training dollars, or state training dollars through the Employment Security Department's Training Benefits program.

# Appendix B: Workforce Training and Education Coordinating Board

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## **The Workforce Training and Coordinating Board (Workforce Board)**

The Workforce Training and Education Coordinating Board (Workforce Board) is a board made up of three employer representatives, three labor representatives, and three state agency representatives, along with major service providers and specific non-voting members. The Workforce Board was created in 1991, replacing four state boards that supervised the state’s tangled training system. The Workforce Board replaced these boards and created a coordinated and more accountable workforce system. The Board’s strategic plan Talent and Prosperity for All, or TAP, details the state’s opportunities and workforce objectives. The Board’s performance reports enforce strict accountability measures that go beyond federal requirements, ensuring the state’s education and training programs receive an objective evaluation, meet Washington’s high performance goals, and offer a return on investment for taxpayers. The Workforce Board is committed to sustaining Washington’s economic vitality through a highly skilled workforce. The board oversees a workforce development system including:

- 16 workforce programs receiving almost a billion dollars annually in state and federal funds.

The Workforce Board is Washington’s leading policy advisor for issues related to the state’s workforce. State law makes clear that the Workforce Board is “the hub” of the workforce training system. The Workforce Board is a small agency with 20-plus full-time staff, focused largely on policy and research, which often guides other key agencies and local boards to take action.

The Workforce Board partners with seven state agencies in the oversight of quality post-secondary education: Employment Security Department (ESD), Washington Student Achievement Council, State Board for Community and Technical Colleges, DSHS – DVR, Department of Services for the Blind, Department of Commerce and Office of the Superintendent of Public Instruction. Part of the Workforce Board’s mission is to bridge the gap between skills of graduating students and the skills employers want.

## **Entry point for customers – WorkSource**

WorkSource is the “one stop” for direct customer service for Washington’s jobseekers and employers seeking to hire skilled workers. WorkSource has a robust website and offers career planning tools including a statewide occupation search, direct links to job opportunities including in-demand jobs, labor market information, help with resumes and interviews, job search skills, tutorials, hiring events, and more. WorkSource employment specialists assist consumers with finding a job and assist some consumers, who qualify for federally funded programs, with post-secondary education. Injured workers already have access to WorkSource assistance at one-stop service locations and the [worksource.wa.com](http://worksource.wa.com) website, and through contracted L&I VRCs on location at regional WorkSource centers.

Four L&I vocational services staff are located at local WorkSource offices and two ESD WorkSource return-to-work specialists are situated within Claims Administration. Two L&I vocational services staff at WorkSource were interviewed about their guidance for injured workers regarding PVS. One counselor said she routinely asks a customer to call prospective employers regarding the desired job goal and ask about their confidence in a particular certificate, whether from a community college or PVS.

## **Workforce Innovation and Opportunity Act (WIOA)**

Many Workforce Board workforce development policies are influenced by the federal Workforce Innovation and Opportunity Act (WIOA). At the federal and state level, WIOA defines a set of programs and money available for employment services, job placement, and education and populations. These populations include unemployed and dislocated workers, low income youth, low income job seekers over 18 years old, foreign trade-affected workers, low income adults who are recipients for Temporary Assistance for Needy Families (TANF), workers with limited literacy skills, or workers needing English language instruction. Access to WIOA programs can be found at the regional WorkSource offices in our state. An online directory of agencies and workforce services, including those provided under WIOA, is located on the Workforce Board website.<sup>23</sup>

The federal baseline on job and completion rates for WIOA-funded training centers is found in the Eligible Training Provider (ETP) list (Appendix C). The ETP criteria for a post-secondary certificate or an accredited college certificate program is 50 percent completion and 30 percent employment for completers over a three-year period.

## **Talent and Prosperity for All (TAP)**

In October 2016, The U.S. Department of Education and Department of Labor formally approved Washington state's workforce plan, "Talent and Prosperity for All" (TAP). The TAP strategic plan focuses on best practices for any prospective student seeking training to enter or re-enter the workforce. The TAP mission is specific to WIOA.

The TAP plan concentrates on Washington's workforce with the intent to help more people find and keep jobs and close the skill gap for employers. The plan includes implementation committees for five areas, including Integrated Service Delivery, Business Engagement, Common Intake Process, Performance Accountability/Data Sharing, Professional Development, and Barriers and Accessibility.

As citizens attempting to re-enter the workforce, disabled injured workers are included in the TAP mission, although funding for vocational training is not WIOA-based. L&I's mission is congruent with the WIOA mission of connecting injured workers with the skills they need to be successful in obtaining a new job and building a career as well as connecting employers with the skilled workers that they need to stay competitive in our state. Some injured workers face similar barriers to workforce reentry, as do some of the identified populations under the Barriers and Accessibility

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<sup>23</sup>Workforce Training and Education Coordinating Board, Washington Workforce Development Services Matrix.

Solutions section of the plan. The Barriers and Accessibility focus is to identify and remove a wide variety of barriers to access, including economic, geographic, physical, mental, and behavioral health barriers.

## **WTECB consumer protections for students**

Students of non-degree granting schools, whether public or private, are protected by the WTECB's Consumer Protection Unit. This unit licenses and regulates private vocational schools and administers a Tuition Recovery Trust Fund for schools that close. The unit provides orientation for new schools and reviews school policies, enrollment agreements, catalogs, and other written materials. Licenses must be renewed annually, and staff do an onsite monitoring visit to schools every two years.<sup>24</sup>

WTECB also has a student complaint process to review unfair business practices of private career schools. Students are advised to attempt to resolve all complaints with the school first. For a student making a formal complaint, tuition may be refunded for licensed private vocational schools violating the principals below:

### Unfair Business Practices

- (1) The school failed to comply with the terms of your enrollment contract or agreement.
- (2) The school falsely claimed that its educational program was approved by a particular industry or that successful completion of its program would qualify you for admission to a labor union or similar organization or for the receipt of a state license in any business, occupation, or profession.
- (3) The school falsely represented that its credits were transferrable to an institution of higher education.
- (4) The school misrepresented its size, location, facilities, equipment, faculty qualifications, or accreditation.
- (5) The school stated that it was approved, recommended, or endorsed by the state of Washington or the Workforce Board.
- (6) The school provided testimonials, endorsements, or other information that misled you regarding its current practices, current conditions for employment, or probable earnings in the occupation for which you trained.
- (7) During the enrollment process, the school referred to its sales agents as counselors or advisors.
- (8) The school made statements it knew or reasonably should have known were false, substantially inaccurate, or misleading.
- (9) The school engaged in false, deceptive, misleading or unfair advertising, sales, collection, credit, or other business practices.<sup>25</sup>

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<sup>24</sup>Workforce Training and Education Coordinating Board: <http://wtb.wa.gov/WorkforceBoard.asp>.

<sup>25</sup>Workforce Training and Education Coordinating Board: [http://www.wtb.wa.gov/PCS\\_Complaints.asp](http://www.wtb.wa.gov/PCS_Complaints.asp).

# Appendix C: Career Bridge and Eligible Training Provider (ETP) List

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## Career Bridge

Career Bridge ([careerbridge.wa.gov](http://careerbridge.wa.gov)) is a free, state sponsored website, sponsored by the WTECB, which connects students to over 6,300 programs of study. Information is available on in-demand jobs, tuition rates, and length of school programs. Published performance measures are tied to the Eligible Training Provider (ETP) list and are not required for all schools. Approximately 40 to 50 percent of the certificate programs listed on Career Bridge show performance measures. Some are simply checked as meeting the federal baseline. Private vocational schools that submit annual student data to the Consumer Protection Unit and *elect* to be on the ETP list will have their data evaluated for performance.

All schools on Career Bridge must report annual student data. Not all data is published. The Veteran's Administration has separately tracked requirements. Reporting requirements vary.

- Community and technical colleges report only non-credit programs (credit programs data is reported to partners and SBCTC, and data is sent directly from them to WTECB).
- Public four-year colleges report only certificate programs (degree programs are reported through ERDC and data is received from them).
- All Workforce Board private career schools, both in state and out-of-state, report.
- All Washington apprenticeship programs data is collected by L&I and received from them.
- WSAC-approved accredited schools report all programs on Career Bridge.
- Cosmetology schools report all programs on Career Bridge.<sup>26</sup>

The Career Bridge website is one source for comparing tuition and program length, but does not offer information on all PVS' programs' completion rates and job placement rates. Many programs are too small to have specific performance measures published. Those school's programs are given a check mark for the ETP list. Program quality is not measured. Licensed schools self-report tuition and program length.

Figures 6 and 7 provide an example of the information available on Career Bridge for comparison of training at various locations for trucking versus general office, accounting and medical office jobs.

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<sup>26</sup> <http://www.careerbridge.wa.gov/>

**Figure 5: Career Bridge website information - General office, accounting/bookkeeping and medical office certificates**

<b>Big Bend Community College, Moses Lake (Community College)</b>	<b>General Office/ Customer Service Certificate</b>	<b>Accounting/Bookkeeper Certificate</b>	<b>Medical Office/Receptionist Certificate</b>
Program length	12 months (66 credits)	12 months (48 credits)	12 months (58 credits)
Estimated total tuition	\$6781	\$4932	\$5,959.50
<b>Office Careers, Renton (Private vocational school – Distance learning)</b>	<b>General Office/ Customer Service Certificate</b>	<b>Accounting/Bookkeeper Certificate</b>	<b>Medical Office/Receptionist Certificate</b>
Program length	12 months	12 months	12 months
Estimated total tuition	\$13,800	\$13,950	\$13,950
<b>Spokane Community College (Community college)</b>	<b>General Office/ Customer Service Certificate</b>	<b>Accounting/Bookkeeper Certificate</b>	<b>Medical Office/Receptionist Certificate</b>
Program length	18 months (97.5 credits)	18 months (90 credits – AAS degree)	9 months (42 credits)
Estimated total tuition	\$10,033.73	\$9,261.90	\$4,322.22
<b>Allied Training Systems, Spokane (Private vocational school)</b>	<b>General Office/ Customer Service Certificate</b>	<b>Accounting/Bookkeeper Certificate</b>	<b>Medical Office/Receptionist Certificate</b>
Program length	46 weeks (920 clock hours)	51 weeks (1,010 clock hours)	57 weeks (1,140 clock hours)
Estimated total tuition	\$14,185	\$15,505	\$16,720
<b>Perry Technical Institute, Yakima (Private vocational/technical school)</b>	<b>General Office/ Customer Service Certificate</b>	<b>Accounting/Bookkeeper Certificate</b>	<b>Medical Office/Receptionist Certificate</b>
Program length	N/A	18 months (2,016 clock hours – AAS degree)	12 months (1,344 clock hours)
Estimated total tuition	N/A	\$29,504.25 (includes books/supplies)	\$21,413 (includes books/supplies)
<b>Renton Technical College (Community college)</b>	<b>General Office/ Customer Service Certificate</b>	<b>Accounting/Bookkeeper Certificate</b>	<b>Medical Office/Receptionist Certificate</b>
Program length	12 months (73 credits)	12 months (64 credits)	12 months (72 credits)
Estimated total tuition	\$8011.75	\$7,034.24	\$7,902

Data Source: Career Bridge website: <http://www.careerbridge.wa.gov/>

**Figure 6: Career Bridge website information – Trucking certificate**

<b>Commercial Driver School, Auburn (Private vocational school)</b>	<b>Trucking CDL Class A Certificate</b>	<b>CDL Class B Dump Truck Certificate</b>	<b>Heavy Equip Operator Mechanic Certificate</b>
Program length	6.5 weeks (260 clock hours)	76 clock hours	N/A
Estimated total tuition	\$14,761	\$7,271	N/A
Estimated clock hour/credit tuition	\$56.77 per clock hour	\$95.67 per clock hour	N/A
<b>Bates Technical College, Tacoma (Community college)</b>	<b>Trucking CDL Class A Certificate</b>	<b>CDL Class B Dump Truck Certificate</b>	<b>Heavy Equip Operator Mechanic Certificate</b>
Program length	6 months	N/A	12 months (106 credits)
Estimated total tuition	\$5,877.93	N/A	\$12,868.52 Include books/fees
Estimated clock hour/credit tuition	\$99.32 per credit hour plus \$2,232.55 for books/fees	N/A	\$99.32 per credit hour plus \$2,340.60 for books/fees
<b>West Coast Training, Kirkland (Private vocational school)</b>	<b>Trucking CDL Class A Certificate</b>	<b>CDL Class B Dump Truck Certificate</b>	<b>Heavy Equip Operator Mechanic Certificate</b>
Program length	4 weeks (160 clock hours)	N/A	8 weeks (320 hours – H.E Operator NCCR)
Estimated total tuition	\$4,750	N/A	\$14,000
Estimated clock hour/credit tuition	\$29.68 per clock hour	N/A	\$34.75 per clock hour
<b>Walla Walla Community College (Community college)</b>	<b>Trucking CDL Class A Certificate</b>	<b>CDL Class B Dump Truck Certificate</b>	<b>Heavy Equip Operator Mechanic Certificate</b>
Program length	2.5 months (22 credits)	10 weeks (22 credits – truck driver training)	15 months (80 credits – diesel technology)
Estimated total tuition	\$2,522.30	\$1,717.32	\$9,172
Estimated clock hour/credit tuition	\$114.65 per credit	\$119.34 per credit	\$114.65 per credit
<b>GMC Training Institute, Grandview (Private vocational school - Bilingual instruction)</b>	<b>Trucking CDL Class A Certificate</b>	<b>CDL Class B Dump Truck Certificate</b>	<b>Heavy Equip Operator Mechanic Certificate</b>
Program length	10 weeks (160 hours)	7 days (53 hours)	N/A
Estimated total tuition	\$7,200	\$5,350	N/A
Estimated clock hour/credit tuition	\$45 per clock hour	\$10 per clock hour	N/A
<b>H&amp;R Elite Trucking, Sunnyside (Private vocational school)</b>	<b>Trucking CDL Class A Certificate</b>	<b>CDL Class B Dump Truck Certificate</b>	<b>Heavy Equip Operator Mechanic Certificate</b>
Program length	4-5 weeks (160 hours)	4-5 weeks (160 hours)	N/A
Estimated total tuition	\$4,090	\$4,090	N/A
Estimated clock hour/credit tuition	\$25.56 per clock hour	\$25.56 per clock hour	N/A
<b>Trans 360, Inc., Vancouver, WA (Private vocational school)</b>	<b>Trucking CDL Class A Certificate</b>	<b>CDL Class B Dump Truck Certificate</b>	<b>Heavy Equip Operator Mechanic Certificate</b>
Program length	1 month (160 hour)s	6 days (48 hours)	N/A
Estimated total tuition	\$4,800	\$3,050 plus fees	N/A
Estimated clock hour/credit tuition	\$30 per clock hour.	\$63.54 per clock hour	N/A

Data Source: Career Bridge website: <http://www.careerbridge.wa.gov/>

## **Eligible Training Provider (ETP) list**

The Eligible Training Provider (ETP) list is a federal standard under the 1998 Workforce Investment Act now modified as WIOA. Most accredited community college programs use the list, which is only open to programs that provide data that meet a baseline of performance thresholds. Those programs that meet those thresholds may receive federal training dollars through WIOA, or state training dollars through the Training Benefits program overseen by the state's Employment Security Department. Participation on the ETP list is voluntary for licensed schools, as well as all other schools and colleges in our state.<sup>27</sup>

ETP-listed schools' programs must meet the Workforce Board's threshold for rates of employment, earnings and completion rates. The ETP list provides an independent verification of job and completion rates based on Employment Security Department data.

In 2014, Governor Insee adopted the most recent ETP thresholds set by the Workforce Board to determine training program eligibility. A program must be ETP-listed to be entitled to WIOA funding (excluding apprenticeship programs), meaning it meets or exceeds each of the following performance floors:

- Completion rate of 20 percent
- Employment rate of 50 percent
- Earning level of \$3,943 in a calendar quarter

Failure to achieve any of the above performance floors will make a program ineligible for Washington's ETP list. In addition, a program must achieve the following on average over a multi-year period:

- Completion rate of 30 percent
- Employment rate of 65 percent
- Earnings level of \$4,965 in a calendar quarter

Schools featured on Career Bridge do not need to be ETP-listed, including:

- Community and technical colleges
- Public and private four-year colleges and universities
- Private career schools
- Washington apprenticeship programs

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<sup>27</sup> Per WTECB source, the Workforce Board sets these performance thresholds, typically annually. They are not set by the federal government directly. However, all states are required to maintain their own ETP lists and it is likely that there is a minimum federal baseline. What is clear is that Washington education programs must meet Washington's standards.

# Appendix D: Helpful Links

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1. Link to Workforce Training and Education Coordinating Board  
<http://www.wtb.wa.gov/WorkforceBoard.asp>



2. Link to Workforce Board Talent and Prosperity for All (TAP) strategic workforce plan:  
<http://www.wtb.wa.gov/WAWorkforcePlan.asp>

3. Link to Workforce Board Workforce Development System Poster:  
[http://www.wtb.wa.gov/Documents/Matrix2014\\_000.pdf](http://www.wtb.wa.gov/Documents/Matrix2014_000.pdf)



4. Link to Workforce Board Private Career Schools and Consumer Protections:  
<http://www.wtb.wa.gov/pcs.asp>  
<http://www.wtb.wa.gov/ChoosingASchool.asp>



5. Link to Workforce Board student complaint form:  
[http://www.wtb.wa.gov/PCS\\_Complaints.asp](http://www.wtb.wa.gov/PCS_Complaints.asp)



6. Link to Eligible Training Provider (ETP) list standards:  
<http://www.careerbridge.wa.gov/Page.aspx?cid=134>

