

WIOA ETP Recertification FAQs

What to Report and to Whom

1. Question: If my school submits annual reports to the Texas Higher Education Coordinating Board (THECB) and the Texas Workforce Commission (TWC) indicating how many drops, how many graduates, how many students are still active, and how many are placed, what do we need to submit from the recertification requirements letter that was sent to us?

Answer: If you submit student-level data to THECB, you are not required to submit additional student-level data to TWC for recertification. But you must still submit documentation of partnerships with employers related to your training programs to your Local Workforce Development Board.

2. Question: Why does TWC need information on students that are not funded by WIOA?

Answer: WIOA requires TWC to report performance data on all students to DOL, not just those funded via WIOA.

3. Question: Is there a special form that eligible training providers (ETPs) should use to submit the required information? How do ETPs submit the data?

Answer: Use the [Excel](#) file provided. E-mail the file to etp.helpdesk@twc.state.tx.us.

4. Question: In terms of submitting information not previously reported to THECB, which THECB report is being referenced? Is it the CB116?

Answer: This only applies to programs that provide student data to THECB through the following reports:

- CM001 (for credit students)
- CBM00A (for students in continuing education)
- CBM009 (for graduates)

FERPA/SSN Concerns

5. Question: What if I am not comfortable sending in SSNs due to FERPA concerns? Has an agreement been signed by the colleges to release this information?

Answer: WIOA requires the reporting of student information. TWC has no discretion to waive this requirement. Schools were notified of the WIOA requirements as follows:

- In June 2015, TWC sent notices out to all ETPs about the new WIOA requirement; and

- In April 2016, TWC sent detailed instructions on how to submit the data required under WIOA.

Regarding FERPA concerns, the WIOA law is clear that reporting the SSNs of non-WIOA-funded students is required. There is no conflict with FERPA or FIPPS.

- FERPA permits the release of student information without student authorizations to “enforce or comply with federal legal requirements relating to the program” under the evaluation exception. See the DOE Office of Family Compliance Office approved PTAC guidance on this issue:
http://ptac.ed.gov/sites/default/files/FERPA%20Exceptions_HANDOUT_horizontal_0.pdf. TWC is a FERPA-permitted entity, the agency designated to implement WIOA federal reporting.
- Schools should include in their information to students that the student’s information will be shared with governmental agencies for mandatory performance reporting under applicable laws. Schools may want to specify that student information will be provided to TWC to evaluate the effectiveness of WIOA programs. Furthermore, TWC is a state educational authority, for purposes of FERPA, as the administrators of WIOA and the Adult Education and Literacy program funded under the U.S. Department of Education.
- If schools continue to have concerns regarding allowable disclosures, then the schools can obtain written authorizations from all necessary students to facilitate the reporting required by WIOA.

6. Question: What do I do if I do not collect SSNs from students?

Answer: If your school would like to be a WIOA Eligible Training Provider, you will have to collect SSNs from students and submit data to TWC due to the requirements listed above.

Letters of Support:

7. Question: Regarding letters of support for partnerships, would one letter of support meet this requirement?

Answer: Yes, one letter of support meets this requirement.

8. Question: As it pertains to the employer letter of support, what exactly is the employer supporting?

Answer: We are looking for letters of support from local businesses that show that the training program will help meet their need for qualified workers and thus has value to the student, community, and local economy.

9. Question: Do we have to provide a letter from a potential employer of students stating there is a need for what they are studying?

Answer: The letter of support from a local employer must document a partnership with an employer related to your training program, not just a need for what the students are studying.

10. Question: Would a list of our advisory board members or a list of externship/clinical partnerships be adequate?

Answer: If your advisory board membership is employer-based, it might serve the partnership purpose. However, the intent of letters of support is not just to show that employers are interested in the training but also to show that there is a partnership with employers who are willing to hire those who complete the program.

11. Question: To whom at the Board do we send the letters?

Answer: The ETP Workforce Board contact. The list is posted on the ETP website.

New WIOA Requirements:

12. Question: Related to agreements, will there be a new PAS Renewal Form that reflects WIOA changes?

Answer: Yes, however, at this time we are waiting on final WIOA regulations before making modifications to the existing PAS Renewal Form.

13. Question: What is being referenced as the actual recertification process? Does recertification involve reentering our programs into the eligible training provider system (ETPS)? And if that's the case and the entries have been grandfathered through June 30, then the April 15 does not apply to this phase, correct?

Answer: The recertification process is taking place outside of the ETPS. Student-level data is being submitted by ETPs for the recertification process. Providers do not need to reenter programs into the ETPS.

14. Question: Will there be a Certification Requirements document that reflects all aspects of being an ETP? When will new performance and reporting requirements be loaded into ETPS?

Answer: Yes, however, at this time we are waiting on final WIOA regulations and performance requirements before making modifications to the ETPS.

15. Question: Related to reporting, we identify our WIOA students based on internal codes tied to method of funding for students. Does TWC run reports per college to which we could make comparisons?

Answer: WIOA §116 requires annual ETP reporting, and those report results will be available online to the public once the Departments of Labor and Education finish developing their report specifications.

16. Question: Why do we have to do this if we have been reporting this information to you already annually?

Answer: Historically, career schools and colleges have only reported student-level data on “completers” to TWC. WIOA requires reporting on all exiters (whether they complete or not), which necessitates separate reporting at this time.

17. Question: Can we have an extension?

Answer: Your recertification remains in effect until June 30, 2016. The initial April 15, 2016, deadline was necessary to ensure that TWC had sufficient time to process all of the program applications and compile data for recertification by June 30, 2016. However, although we will continue to accept your data and you can still be certified as a provider, we cannot guarantee that there will not be a break in service.

18. Question: What is the <Institution ID>?

Answer: The school’s provider ID.

19. Question: What is the <Program ID>?

Answer: The program CIP code.