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Category: TAA/NAFTA
Subject#: Placement/Assessment Testing; Training at Non-Accredited Providers
Source: State/Federal
Revise/Replace: None
Contact: Ron Busby
Distribution: One-Stop Regions
Colorado One-Stop System Policy Guidance Letter#: 02-23-TN
Date: July 1, 2002

I. REFERENCE (S): Trade Act of 1974 (Revised); 20CFR617.22(a)

II. PURPOSE: To provide guidance for submission of requests for TAA-approved training.

III. BACKGROUND: When considering a request for occupational training the TAA counselor must rely on some assessment of the training applicant's competency to undertake and complete the requested training, as specified in the regulations at 20CFR617.22(a)(5). Often, that assessment is supplied by the training vendor in the form of a placement test (e.g.: COMPASS); however several vendors provide no such service to their applicants. Yet placement or assessment test scores are often the only resource available to determine that this criterion has been met.

The regulations at 20CFR 617.22(a)(6)(iii)(B) state that "when training, substantially similar in quality, content and results, is offered at more than one training provider, the lowest cost training shall be approved..." In effect, cost is a consideration when comparing substantially equal programs. Although procedures have been developed for comparing "content" (curricula) and "results" (credentials) no procedure has been developed for comparing "quality", even though a student's job readiness (see 20CFR617.22(a)(2)) may well hinge upon the "quality" of his or her training. Accrediting agencies exist to provide the expertise to assess and validate the quality of educational and vocational institutions, and should be relied upon to help determine whether a

particular curriculum meets certain standards for efficacy. Accrediting organizations exist for a wide range of vocations and disciplines, and an effort should be made to determine whether one exists for the type of school and training an applicant has chosen, with the understanding that a non-accredited school is not "substantially similar in quality" to an accredited school.

IV. POLICY/ACTION: Assessment: All requests for TAA-approved training will be submitted with a validated achievement test of the applicant's reading, writing and math skills and the standards which were applied to determine the applicant's need, if any, for remedial training prior to undertaking the requested occupational training. If such standards are not forthcoming from the training vendor, then the standards developed by the local Workforce Board should be applied.

Accreditation: A training application will not be submitted if such training is conducted by a non-accredited provider when training is available at an accredited school that is:

- reasonably available
- provides essentially the same credential
- is otherwise approvable

Attachment A is a list of accrediting agencies compiled by the Colorado Department of Higher Education. A more extensive listing can be viewed on the US Department Of Education website: <http://www.ed.gov/offices/OPE/accreditation/accredus.html>. This policy applies when the requested training is offered only at a proprietary or private occupational school.

The TAA Coordinator's Office will distribute a revised form TAA 859, *Applicant Vocational Plan*, to reflect this new policy.

V. IMPLEMENTATION DATE: This policy is effective upon receipt of this Letter.

VI. INQUIRIES:

Robert D. Hale, Director
Division of Employment & Training