

1550 Gadsden Street
Post Office Box 995
Columbia, SC 29202

May 5, 2004

Ms. Emily S. DeRocco
Assistant Secretary
U.S. Department of Labor
Employment and Training Administration
200 Constitution Avenue NW
Washington, D.C. 20210

Dear Ms. DeRocco:

On behalf of the South Carolina Employment Security Commission, the administrative entity for the Workforce Investment Act (WIA), I am requesting an extension to the waiver we were previously granted for the Eligible Training Provider List, which expires on June 30, 2004. Please see the attached initial waiver request of the subsequent eligibility requirement that all mandated performance items must be submitted and acceptable levels met for programs/courses to remain on the List. I am requesting a waiver extension through June 30, 2005, to allow us additional time to address the barriers our State continues to face towards system building and producing the required data.

The following is a list of goals outlined in the initial waiver request, along with the progress we have made towards meeting these goals during the waiver period:

- *The State, local areas and training providers will collaborate and coordinate together to develop systems for data collection, and/or determine alternative sources of substantially similar data.*

The State Workforce Investment Administrative Department (SWIAD) explored linking the Employment Tracking and Occupational Data (ETROD) and Eligible Provider systems for data collection, as well as, discussed substantially similar forms of data that may be used with the South Carolina Commission on Higher Education. However, an additional barrier in regard to the Family Educational Rights and Privacy Act (FERPA) and the confidentiality of student records has prevented us from pursuing these options further.

The State and local areas have collaborated together to develop the Virtual One-Stop (VOS) on-line reporting system, which was implemented on October 4, 2002. VOS is a real-time, on-line system for WIA intake, case management, tracking of services, follow-up and reporting. With this new system we will have the capability of retrieving performance data for WIA students by course/program.

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Over the next year, we anticipate adding a consumer reports component to the VOS system to further our data collection capabilities for the Eligible Training Provider System.

- *The waiver will allow additional time for training providers to compile the required data.*

We continue to face difficulties with the reporting of “all students” data by course/program. Many providers indicate that the collection of this data is not cost effective for them. Due to numerous budget cuts in our State, many of the Technical Colleges and Universities do not have the manpower available to produce the specific data required under the Eligible Provider System. Also, we have faced barriers with confidentiality issues and the FERPA. However, we will continue to encourage the collection of this data, but do not want to remove a viable training provider from our State List due to lack of resources available to collect the data.

- *WIA participants to enter and exit the system to produce WIA student data.*

With the passage of time, our WIA student database continues to increase as more participants move through the system, resulting in additional data for course/program evaluation. We still have some gaps in retention data, which should be corrected as follow-up information becomes available and is added to the VOS system. As stated earlier, the VOS system will allow us to retrieve the data by course/program, thus relieving the burden of WIA student data collection from the training provider.

- *Performance levels to be brought up for new and existing programs.*

Since the collection of “all students” data is not complete, it is difficult to determine performance levels for some providers. However, pending this waiver, we have requested LWIA administrators to submit any partial data available for those training providers extended through June 30, 2004. With the receipt of this data, we should be able to better determine performance levels. In regard to the WIA student data, performance levels appear to be improving as more WIA participants are included in the performance calculations.

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We have made significant progress in the past year towards the development of our Eligible Training Provider System. Currently, South Carolina's List has 157 providers at 246 locations with 3393 programs/courses available. This large variety of training programs has greatly enhanced the WIA principle of consumer choice in our State. There are still some shortfalls that we are dealing with, as described above. However, we will continue to collaborate and coordinate with local areas and training providers to serve the training needs of our existing and emerging workforce, and further the success of workforce development in our State.

Any questions concerning this request should be directed to Sam Jordan at (803) 737-2611 or email to sjordan@sces.org.

Sincerely,

Roosevelt T. Halley
Executive Director

RTT/jdb
ES-5
cc: Dr. Helen Parker

Attachment: Eligible Training Provider Waiver Request of March 13, 2002