

ILLINOIS COMMUNITY COLLEGE BOARD

Statewide Community College System Agreement on the Implementation of Apprenticeship Programs

Background:

Higher Learning Commission¹ (HLC) Policy INST.F.20.040 requires that an accredited or candidate institution notify the HLC and seek prior approval if the institution wishes to initiate a contractual arrangement in which the institution outsources some portion of its educational programs, i.e. degrees or certificates offered for academic credit to: 1) an unaccredited institution, 2) an institution that is not accredited by an accreditor recognized by the U.S. Department of Education, or 3) a corporation or other entity. Under current HLC rules:

- **Less than 25%** of any educational program outsourced to the other party requires commission notification;
- **25%-50%** of any educational program outsourced to the other party requires prior commission approval;
- **More than 50%** of any educational program outsourced to the other party will receive intense scrutiny and will not be approved by the Commission except in exceptional circumstances. (Note that 34 CFR 668.5(3)(ii)(A) provides that educational programs provided through contractual arrangements between an accredited institution and an ineligible entity wherein more than 50% of the educational program is being provided by the ineligible entity will not receive Title IV² assistance even if approved by the accreditor.)

See: <http://policy.hlcommission.org/Maintenance-and-Monitoring/institutional-change.html>

Furthermore, institutions accredited by the Higher Learning Commission provide primary and sufficient oversight of all contractual or consortial program curricula, to include quality and learning goals, regardless of mode or location of delivery.

See <http://policy.hlcommission.org/Policies/criteria-for-accreditation.html>, Criterion Three, A., 3.

Illinois Community College Board³ (ICCB) Authority as it relates to Apprenticeship Programs:

The ICCB approves all degree and certificate programs that are developed by and offered by the Illinois Community College System's 48 community colleges (P.A. 78-669).

¹ The Higher Learning Commission (HLC) is one of six regional accreditors in the United States. HLC accredits degree-granting post-secondary educational institutions in the North Central region, which includes 19 states.

² Title IV Funds are federal financial aid grant, work study, and loan funds.

³ The Illinois Community College Board is the Board of Trustees of an Illinois Public Community College district which serves as a coordinating board for the 48 public community colleges in Illinois whose authority is outlined in P.A. 78-669.

Consensus Items

The following items represent consensus points reached during discussions with relevant stakeholders.

- The curriculum utilized across registered apprenticeships is rigorous and relevant and students deserve to earn college credits or their equivalent for participation in apprenticeship programs, provided they are registered apprenticeship programs or meet the Non-Registered Apprenticeship Training Model definition as being developed by the Apprenticeship Standing Committee (ASC) of the Illinois Workforce Innovation Board (IWIB)⁴.
- Apprenticeship programs are a key component to the effective implementation of the Illinois workforce system and a robust career pathway system. As such, they are central to the implementation of the Workforce Innovation and Opportunity Act's (WIOA) definition of career pathways and represent a key integration point between the workforce and education system in Illinois and nationally.⁵
- Significant accreditation requirements are in place to ensure that programs offered for credit meet the standards and rigorous expectations of college-level courses, whether transfer oriented (e.g. political science, sociology, etc.) or career and technical oriented (e.g. welding, construction, information technology, electrical, etc.). These accreditation requirements apply to all curricula offered by or affiliated with the Illinois community colleges.
- All curricula that are credited by the college must meet specific standards of academic control. This includes the ability for the college to determine and approve the curriculum through the internal college process, engage in evaluation and review of the curriculum, the classroom, student outcomes, etc.
- Based upon ICCB rules, colleges are not permitted to claim the credit hours earned by entering into third-party contractor agreements for the delivery of curricula, including but not limited to apprenticeship programs. This neither exempts those programs from the academic control requirements of the ICCB, the Higher Learning Commission, or the local college, nor does it preclude agreements about fee structure and other payment arrangements between the third-party provider (including apprenticeship providers) and the college.

⁴ The Governor-appointed Illinois Workforce Innovation Board (IWIB) includes leaders from state, business, industry, labor, education and community-based organizations with the goal of evaluating and meeting the workforce needs of Illinois' employers and workers. For more information go to: <https://www.illinoisworknet.com/WIOA/Pages/IWIBGuide.aspx>

⁵ As defined by the Workforce Investment and Opportunity Act (WIOA), a career pathway is a combination of rigorous and high quality education, training, and other services that— (A) aligns with the skill needs of industries in the economy of the State or regional economy involved; (B) prepares an individual to be successful in any of a full range of secondary or postsecondary education options, including registered apprenticeships; (C) includes counseling to support an individual in achieving the individual's education and career goals; (D) includes, as appropriate, education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster; (E) organizes education, training, and other services to meet the particular needs of an individual in a manner that accelerates the educational and career advancement of the individual to the extent practicable; (F) enables an individual to attain a secondary school diploma or its recognized equivalent, and at least 1 recognized postsecondary credential; and (G) helps an individual enter or advance within a specific occupation or occupational cluster.

Policy Statement:

1. This policy was developed by the Illinois Community College Board and was reviewed by the Illinois Community College Chief Academic Officers and selected leaders from labor and business with a vested interest in apprenticeship programs. The policy was also reviewed by the IWIB Apprenticeship Standing Committee.
2. The purpose of the policy is to standardize and align expectations for apprenticeship programs in Illinois, given the aforementioned accreditation requirements.
3. For purposes of this agreement apprenticeship consists of those programs that are registered with the U.S. Department of Labor's Office of Apprenticeship and / or that have been identified as meeting the rigorous criteria laid out by the ASC committee to the IWIB, to wit:

USDOL Registered Apprenticeship:

Registered Apprenticeships have five characteristics: (1) business involvement; (2) structured-on-the-job training; (3) related instruction; (4) rewards for skill gains; and (5) a national occupational credential. In Illinois, these apprenticeships are approved through the USDOL Office of Apprenticeship. For more information go to: <https://www.doleta.gov/oa/regdirlist.cfm>

Non-Registered Apprenticeship Training Model:

This model includes the 5 characteristics laid out by the USDOL but does not require that the apprenticeships are approved by the USDOL. This is a category based upon the Apprenticeship Plus Model from the IWIB's Apprenticeship Standing Committee.

4. This does not include pre-apprenticeship or youth apprenticeship programs.
5. This agreement affects only programs that have been approved by the Illinois Community College Board with the express intent to provide credit hours equivalencies (either through credit for prior learning, direct credit or equivalencies between curricula) for students.

Adopted Policy:

1. Based upon Higher Learning Commission Standards, Apprenticeship Programs in the state of Illinois shall not exceed 50% of the credit hours offered for the Associate of Applied Science Degree program⁶ offered at the community college.

For example, an A.A.S. program that includes 66 total credit hours would not be allowed to offer more than 33 "equivalent" credit hours from a student's apprenticeship learning experience, regardless of actual seat / program time on site at the place of employment.

Students would be required, in this scenario, to complete 33 additional credits at the community college to earn their A.A.S. degree, of which 15 credit hours must be general education, pursuant to ICCB requirements (see: Section 1501.302 of the ICCB Administrative Rules).

⁶ An Associate in Applied Science Degree is an award for the satisfactory completion of a prescribed curriculum intended to prepare individuals for employment in specific field.

2. The ICCB will no longer consider for approval, apprenticeship programs that exceed this 50% threshold without a college meeting the criteria in item 3.
3. Programs exceeding this 50% requirement would need HLC approval. Such approval must be submitted as a part of the unit of instruction (program) application, or as a part of any reasonable and moderate extension request. Only in these cases would the ICCB would only consider programs beyond this threshold when HLC approval is submitted with the program application.
4. All existing community college apprenticeship programs must be brought into compliance with this rule as soon as possible with the understanding that is included in item 5.
5. Currently enrolled students should be awarded credits as reflected in existing agreements, but no new students should be enrolled prior to program modification to meet this 50% threshold.
6. All colleges must provide the ICCB with regular annual updates on the implementation of this change until such time as all enrolled students have completed or otherwise exited this program and the program is enrolling only students under this model only.