

Job Placement Reporting Submitted by Michale McComis

This is a rough first draft to get the topic of limited exclusions on the table. The rationale here is to establish a reasonable yet limited set of exclusions for students, i.e., those students who “completed the program,” who can be removed from the job placement rate calculation. This may be useful as the job placement rate calculation appears to be, at least as proposed, an accountability bright line institutions so holding institutions accountable for those graduates who can and should be working/able to work may be more appropriate. A key is that the exclusion must be “verified” (this can be strengthened further by adding “independently verified”). There is also proposed language to broaden the basis of the Governor’s analysis to “other valid, reliable, and verifiable sources.” The (x) and the (y) in the proposed codification is a placeholder for the Department to properly determine.

Proposal:

690.94 (a)(2)(ii)(B)

(B) A job placement rate of at least 70 percent, calculated as the percentage of students who ***completed the program and*** are employed in ~~the~~ ***a related occupational field*** for which the program prepares students (as identified through the process established under 34 C.F.R. 690.93 (b)) or a comparable high-skill, high-wage, or in-demand occupation during the second quarter after successfully completing the program, as determined through a certification from the Governor, based on the Governor’s analysis using available administrative data, including wage records ***or other valid, reliable, and verifiable sources deemed appropriate by the Governor.***

(x) Exclusions. A student may be excluded from both the numerator and the denominator of the job placement rates calculation if the institution has verified using valid and reliable means that—

(y) The student died;

(y) The student is enrolled on full-time basis in a next-tier eligible program at the institution or at another eligible institution during the period for which the institution reports the job placement rate under paragraph (B) of this section;

(y) The student is unable to work in a training-related field due to active military service;

(y) The student unable to work in a training-related field due to a documented medical condition including pregnancy; or

(y) The student is incarcerated.