MEMORANDUM

DATE	10/22/2015
TO	Task Force Members- Innovative Subject Matters
FROM	Ben Triffo, Legislative Analyst
SUBJECT	Task Force Report Preliminary Draft

Background:

Attached is a draft of the Task Force Report on Innovative Subject Matters. This preliminary draft was prepared by Bureau staff to provide the Task Force a framework for discussion at the October 29, 2015 Task Force Meeting. It includes a brief history of the Bureau, a summary of the comments by guest panelists who spoke to the Task Force, and identifies the categories of subject areas that the Task Force must include in the report.

Action Requested:

To review the draft and be prepared to progress toward final recommendations and findings so that the Task Force Report may be transmitted to the Advisory Committee no later than January 1, 2016.

Coding the Future

Recommendations for Regulatory Oversight in the High Technology Education Field

BPPE
Bureau for Private Postsecondary Education

STATE OF CALIFORNIA
dca
DEPARTMENT OF CONSUMER AFFAIRS

EXECUTIVE SUMMARY:

TBD

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TASK FORCE MEMBERS:

Pictures or Brief Bios?

Shawn Crawford, Chair

John Carreon

Marie Roberts De La Parra

Liz Simon

Kim Thompson-Rust

THE LANDSCAPE

During the late 1980's, private postsecondary education was regulated by a division within the State Department of Education. It was during this time California developed a reputation as the "diploma mill capital of the world". Despite its seeming positive moniker, the title was given to California because private institutions at that time were indiscriminately offering postsecondary degrees without proper oversight. The result was growing concern over the integrity and value of the degrees issued by private institutions. Senate Bill 190, the Private Postsecondary and Vocational Education Report act of 1989 (Reform Act) overhauled the state's regulatory program and oversight authority of private colleges was transferred to a 20 member Council which operated as a separate entity under the umbrella of the Department of Education. Concurrently, the Maxine Waters School Reform and Student Protection Act was adopted, and expanded requirements and standards for private institutions with respect to solicitation, recruitment, enrollment and school performance.

In 1995 The California Postsecondary Education Commission found that as many as 1000 unapproved institutions were still in operation in the state. In order to address this lingering concern, Assembly Bill 71 (Wright Act) was enacted in 1997 creating the Bureau for Private Postsecondary and Vocational Education (BPPVE), concurrently moving the oversight of these institutions to the Department of Consumer Affairs (DCA). Still, the Wright Act simply transferred responsibility for administration of the Reform Act to the BPPVE, and extended the Reform Act's sunset date. Following an ineffective tenure, on January 1, 2007 the regulatory authority of the BPPVE was allowed to sunset, dissolving the Bureau and leaving the state without a regulatory body to oversee private institutions and ultimately, protect students.[1]

Bureau for Private Postsecondary Education

In 2009, the Legislature and the Governor reached agreement on the need to regulate these institutions and codified the Private Postsecondary Education Act (Assembly Bill 48, Portantino, Chapter 310, Statues of 2009), thus creating what is now known as the Bureau for Private Postsecondary Education under the California Department of Consumer Affairs. Today, the Bureau is responsible for:

- Protecting consumers and students against fraud, misrepresentation, or other business practices at private postsecondary institutions that may lead to loss of student tuition and related educational funds;
- Establishing and enforcing minimum standards for ethical business practices, health and safety, and fiscal integrity of postsecondary education institutions; and
- Creating and enforcing minimum standards for instructional quality and stability for all students in private postsecondary education and vocational institutions.

Founding of the Task Force

In yet another reform, the Bureau's authority was recast charging the Bureau to create a Task Force to review standards for education and training programs which specialize in innovative subject matter and instruction for students in high-demand technology fields for which there is a demonstrated shortage of skilled employees – Senate Bill 1247 (Lieu, Chapter 840, Statues of 2014). Specifically the Task Force is to report on the disclosures students receive upon enrollment at an institution; whether the means of reporting student outcomes and the content of those reports are appropriate, and steps the state may take to promote the growth of high-quality training programs in skills for high technology occupations.

The attention that is being given to High Technology Programs is not exclusive to the state level; as the White House has viewed these institutions as a priority as well. In fact, according to the TechHire Initiative, "Employers across the United States are in critical need of talent with these skills. Many of these roles do not require a four-year computer science degree."[2] This is supported by a recent study by the Bureau of Labor Statistics, which shows that there are currently over half a million unfilled jobs in information technology throughout the entire U.S. economy. These vacancies represent approximately 12% of the openings in the United States, the largest of any category.[3] It is strange that there are large numbers of vacancies within the sector given that, "IT jobs in fields like cybersecurity, network administration, coding, project management, UI design and data analytics offer pathways to middle-class careers with average salaries more than one and a half times higher than the average private-sector American job."[4]

With this information in mind, the Task Force began by holding a series of meetings between April and **Final Month** 2015. The Task Force consists of two members from the BPPE's Advisory Committee, a Postsecondary Education Expert, and two institution affiliates; along with input from the BPPE's Chief. It is because of this holistic makeup that the Task Force was able to draft agenda items that contained input from their individual members, along with pressing issues directly from the BPPE, as well as public concern. This blend of input led to robust meetings and discussions that ensured that the need of private industries was met through responsible and fair regulatory proposals, and assurance that students would not be victim to predatory practices that can occur in the private postsecondary industry.

During the meetings the Task Force heard from a variety of speakers that came from the likes of the Bureau for Private Postsecondary Education, former students, institution representatives, employers of graduates of these institutions, and various subject matter experts[5]. In order to decide who would be providing testimony; the Task Force requested contact information of previous students, and employers of graduates from two Bureau approved institutions; Dev Bootcamp and General Assembly. Dev Bootcamp and General Assembly provided an extensive list

of names of both previous students, and employers of graduates. Individuals were randomly chosen off of these lists, and contacted in regards to participation on a given panel. The end result was a panel of three former students, and a panel of three employers of graduates. Concurrently, the institutions also provided contact information for regional leadership from each of their respective companies. The Task Force also took into account various student complaints against High Technology Programs. These complaints were compiled from Bureau received complaints, as well as those taken from reputable industry websites. These complaints were reviewed and taken into consideration when recommendations were being finalized. All information in this report is derived from said complaints, testimonials, meeting minutes, meeting webcasts, and expert opinion.

What is a High Technology Program?

Based on meeting testimonials, the Task Force decided that there are a broad set of characteristics that can be used to classify an institution as having a High Technology Program. However, due to the fluidity of the technology sector, it must be noted that these characteristics, like the sector, can be constantly evolving. It was determined that a High Technology Program:

- Provides instruction on innovative subject matters that will prepare graduates for highly skilled employment in which the graduates are proficient in the theoretical and practical application of these innovative subjects. These subjects may include, but are not limited to:
  - Computer systems and analysis;
  - Data science and analytics;
  - Programming;
  - Software engineering and development;
  - Computer science;
  - Coding;
  - Analysis, design, business and marketing associated with these innovative subject matters.
- Is non-credit bearing, with a length of less than 600 clock hours or 20 weeks, and is offered by a non-accredited institution.
- Focuses on soft skill development, is collaborative in nature, and is project-based and competency driven, in which the program's skills are defined and assessed based upon workforce demand and employer feedback, and are graded on a pass/fail basis.

Approach and Methods for Protecting Students and Fostering Growth

The High Technology Program Task Force believes that ensuring student protection and cultivating a landscape of innovation are imperative to the strength of California's economy and the upward mobility of its residents. The Task Force advises that the California State Legislature adopt and implement the

following recommendations and allow High Technology Programs to meet California's workforce demands.

Disclosures

Under current law, there are a variety of disclosures that a student must be provided prior to enrollment in a private postsecondary institution. Two of the primary disclosures that are provided are the school catalogue and the enrollment agreement. The goal of these disclosures is to ensure that students are able to make a well informed decision regarding the institution, and course of study that they wish to pursue.

Topics covered in school catalogues and enrollment agreements include, but are not limited to:

- General institution information, along with program specific details (including a description of instruction provided)
- Detailed information on a student's right to cancel/withdraw and refunds
- An itemization of all institutional charges and fees
- Certification that student has received the catalog and School Performance Fact Sheet
- Faculty qualifications
- Admissions, probation and dismissal, and attendance policies
- Whether the institution participates in federal financial aid
- If the institution provides placement services, a description of the nature and extent of the placement services
- BPPE contact information

Seeing as there are notable differences between traditional private postsecondary institutions and High Technology Programs; the Task Force has decided that there is additional information that should be provided to prospective students. These additional disclosures will ensure that student protection is being met and that students are able to determine if a High Technology Program is a fit for them

For a more in-depth discussion of these issues, please refer to the Summary of Disclosures Testimony section of the report.

Recommendations

1. Introduce a new component of the course catalogue that addresses the rigor involved with the program.
    a. Detail program specific expectations and characteristics; including but not limited to pre-work requirements, the collaborative nature of the program, and time commitment.
    b. ***Insert any specific language, or reference an example created by the Task Force and include in an appendix***

2. Include in the course catalogue a detailed section that discusses career placement services.
    a. Provide specific details regarding expectations from both the student and the institution.
    b. ***Insert any specific language, or reference an example created by the Task Force and include in an appendix***
3. Add a component to the course catalog that details the specific soft skills that will be targeted and developed throughout the course of the program
    a. Institutions will discuss/plan this segment of their program during the mandatory Licensing Workshop discussed in a later section on this report.
4. Add to the enrollment agreement an area for students to attest that they have been provided information on program rigor and career services.

Outcomes

Along with the enrollment agreement and course catalogue, another primary disclosure that is provided to students is the School Performance Fact Sheet (SPFS). The SPFS is the primary means of reporting/providing former student outcomes to prospective students. Students rely on this data to make informed decisions when it comes to selecting a career path. With this is mind, the BPPE requires certain data points to be captured on this document.

With a SPFS, a prospective student can ideally view a given program's:

- On-time Completion Rates
- Job Placement Rates
- State Licensure/Exam Results
- Salary and Wage data for students with employment in a related field of study
- Cohort Default Rate

Though the SPFS is fairly encompassing, it does not always present a complete picture. Disclosures are only as reliable as the data that they provide; and to this end the Task Force wants to ensure that all data that is being provided is relevant and accurate. To ensure that this is enacted, the Task Force has made modifications to SPFS provided by High Technology Programs and how the outcome data contained in the SPFS is collected.

For a more in-depth discussion of these issues, please refer to the Summary of Outcomes Testimony section of the report.

Recommendations:

5. At a minimum, conduct a pilot program that reports salary/wage information from High Technology Program graduates in an alternative format.

a. Compare social security numbers of graduates to Base Wage data that is available through the Employment Development Department (EDD). ***Do we want to discuss in-depth methodology, if so how much?***
   b. Base the methodologies of this program off of the California Community College Chancellor's Office (CCCC) program "Salary Surfer" ***Potentially reference this methodology in an appendix.***
   c. Report wage data by institution, and use median salary as the reportable figure.
6. Modify the SPFS to better fit the characteristics of High Technology Programs.
   a. Ensure that the SPFS is in compliance with the proposed regulation changes, in particular those surrounding gainful employment language, and federal financial aid.
   b. Remove components of the SPFS that do not pertain to High Technology Programs, such as the 150% Completion Rate, Exam/Licensure table, and the Cohort Default Rate.
   c. Supplement the current Salary/Wage table with the institution specific data from the above program.
   d. ***Include in an appendix the sample modified SPFS***

State Steps

The current nationwide need to promote growth and meet workforce demand in the IT sector is essential to the health of our nation's economy; and California has a prominent role to play. California is consistently at the forefront of innovation, and the IT sector is no different. With the IT hotbed located in the greater San Francisco Bay Area, the state of California has a responsibility to foster an environment of innovation, and ensure that their students are kept on the cutting edge of technology.

Charged with this task, the Task Force decided to review industry specific barriers to entry for not only institutions, but for students as well. The information that was discovered confirmed many widely held beliefs, and reinforced the need for action. High Technology Programs are faced with lengthy timelines when seeking BPPE approval, often leading to a competitive disadvantage amongst their peers; while students from underserved communities and underrepresented demographics continue to be left behind the current wave of innovation. With this information in mind, the Task Force finds it necessary to modify the application process for High Technology Programs, and to increase outreach to underserved and underrepresented students.

For a more in-depth discussion of these issues, please refer to the Summary of State Steps Testimony section of the report.

Recommendations:

7. Simplify (***modify?***) the approval to operate application process for High Technology Programs.
   a. Require that prospective High Technology Programs attend a Licensing Workshop. At this workshop discuss issues not only specific to High Technology Programs (career services, additional disclosures, what soft skills will be developed) but also items that cause a delay in application processing (financials, complete application)

b. Designate a High Technology Program expert as a point of contact within the BPPE.
    c. Create a Program Advisory Committee specific to High Technology Programs that takes the place of the Quality of Education Review. This alternative review process will help eliminate the backlog in the BPPE's Licensing Unit, decrease application turn time, and ensure that programs being instructed are relevant, and are keeping students on the cutting edge of technology.
        i. *Kim's specifics here*
8. Increase outreach efforts to those underrepresented in the IT field.
    a. Create a state-funded scholarship program for underrepresented students.
        i. *Shawn working on specifics*
    b. Develop an outreach program that reaches out to underserved communities to inform of opportunities within the IT sector.
        i. *Shawn working on specifics*

Summary of Testimonies Heard

Per the statutory mandate in California Education Code 94880.1, the Bureau's Task Force is charged with reviewing standards for educational and training programs specializing in high-demand technology fields and innovative subject matter and was tasked with making recommendations on a series of related questions. The intent is to lay the foundation for the bureau to make concrete and efficacious changes to the high-technology education and training fields to ensure student success and provide an avenue for the state to respond to the shortage of skilled employees in California. The following section provides a summary of the testimonies heard by the Task Force from a variety of speakers which have helped shape the recommendations that have been listed in this report.

Institution Testimony

The Task Force first spoke with representatives from two Bureau approved immersive educational institutions that educate students in technology, business and design – General Assembly and Dev Bootcamp. While these institutions have different missions and student communities, there were many similarities in the disclosures that each institution provides to its students.

Both institutions noted that they view the disclosures as part of a greater admissions process. General Assembly's admissions process beings with an application, followed by an interview with an admissions representative. This interview is designed to review the time commitment, and the resources required for the program and serves as the initial informal disclosure about the expectations and realities of each student. Following the interview, students complete a coding exercise designed for applicants with no coding experience. After the coding exercise the prospective student completes an interview style activity to determine if the individual will work well in groups, and that their admissions are a match for the program. Following this step, the applicant will meet with an instructor to go over the results of the coding exercise and debrief about the previous admission activities. Should the applicant complete the

entire process, they are offered admission. Prior to final enrollment however, students are provided with a school catalogue that outlines course information, graduate information (employment, salary, etc.), time commitments, and overall student expectations. In the same vein, representatives from Dev Bootcamp noted their admissions process is fairly similar to that of General Assembly. During the application process, prospective students are directed to former student testimonials, along with responses to Frequently Asked Questions. After an application has been submitted, the prospective student will have an interview with an alumnus, wherein they are introduce to the Student Code and Student Agreement. These documents outline the time commitment, and expectations of the prospective student. After the interview, if the student is viewed as a fit for the program they will be offered admission. Both institutions attempt to be as upfront as possible with all potential students about the rigor and demand of their programs. After a student has been granted admission, both institutions have an "on ramp" program for students (Dev Bootcamp's "Phase Zero" and General Assembly's "Pre-Work"). The on-ramp programs, which can also be understood as an informal orientation, are web-based, and serve as an introduction for the students to their class cohort as well as their staff and faculty (having continued discussions on expectations). They also help lay the groundwork for students' technical knowledge.

After discussing the admissions, and the pre-work process of both institutions, the Task Force felt it was important to be informed of any feedback from current or former students received by the institutions regarding disclosures. The intuitions self-reported that more often than not students note they would have liked to have been more aware of the intensity of the program. Both General Assembly and Dev Bootcamp are rigorous and intensive programs that seek to immerse students and challenge them to learn new, high-technology skills in a fast-paced environment. Representatives reported that typically six weeks into the programs students "hit a wall" and tend to struggle in overcoming challenges presented to them. Accepting this reality and seeking to promote greater student resource and stress management, General Assembly provides a support structure for students through constant access to instructors and one on one coaching. Along with on location alumnus to help give advice to students, Dev Bootcamp takes a more unique approach by having mandatory on-site therapy sessions, as well as required yoga classes once a week. Both institutions noted that while it is important to be as transparent as possible about the program rigor prior to enrollment, students' responsiveness, organization and work ethic play significant roles in their experience.

As was the case with the admissions process, there is a substantial amount of overlap in the qualities of successful programs when it comes to student outcomes. Dev Bootcamp and General Assembly both seem to excel in coaching and support, they have extensive hiring resources, and they actively survey their graduates; leading to reporting of successful student outcomes.

From as early as a student's on-ramp period, Dev Bootcamp and General Assembly make it clear that there will be a firm level of support when it comes to careers after graduation. Both schools begin this support by introducing soft skills early on. These skills include working within a group dynamic, meeting project deadlines, presentation skills, etc. Both institutions believe that by exposing students to these skills it will help develop the necessary acumen to be successful in a high pressure work environment.

Along with these soft skills, students also are exposed to mock interviews, resume critiques, and are aided in the creation of a social media profile, i.e. LinkedIn. During this period students are also introduced to career coaches who provide support and recommendations to the students throughout their time in their cohort. It is clear that both institutions believe that the consistent exposure to these soft skills and resources allow their students to be competitive job seekers after graduation.

Another common element between the two schools is the various employment resources that are provided to students during their time in the program. While students are a part of their cohort, both institutions provide access to various systems that allow students to be exposed to potential employers. Though these systems have variances in their specific abilities, the overall capabilities are the same. When given access, students are able to post their resume, examples of their work, and articulate particular skills they have. Potential employers are also able to view these profiles, allowing them to determine if the student is a fit with their company, and provides them with a channel to communicate directly with the student. Career coaches typically have access to this platform as well, allowing them to stay in contact with the student and provide support as needed. They are able to see where the student is in the job search process (companies they have applied to, interview status, resume critiques). It is also not uncommon for the institutions to host meet and hire events that allow students to interact with potential employers. Students are invited back to these events as many times as they wish. The continual career support and resources that students are provided after graduation are demonstrations of the dedication that both Dev Bootcamp and General Assembly have towards their student's development.

The Task Force again turned to General Assembly and Dev Bootcamp for any recommendations for growth in the high technology sector. Similar to their responses towards disclosures, and outcomes; both institutions agreed that to foster growth in the sector, more work must be done to increase diversity.

While it is recognized that the high technology sector currently has low representations amongst women and people of color; it was surprising to see the proactive approaches that these two institutions have taken to help bridge the gap. Both institutions noted that women and people of color only represent approximately 20% of the workforce in the high technology industry (though the San Francisco Bay Area is slightly higher). Both institutions offer scholarship programs for underserved communities, people of color, and women in order to help bring the economic opportunities to a demographic that may not be consistently exposed to the industry. Dev Bootcamp and General Assembly both mentioned the White House's "Tech Hire Initiative", noting that it has helped reinvigorate their desire to work towards equal representation in their programs. Both schools noted that though they have been working towards these goals, much more work needs to be done across the sector.

Former Student Testimony

After speaking with institution representatives, the Task Force spoke with three recent graduates from both institutions. Each student came to their program with a different background, and for a different reason, yet there were common themes present between each of their experiences. The first item that was overlapping in each student's experience was the transparency of the institutions. All three students noted that each school was upfront and honest about the rigors and expectations of the program; and that they were not surprised by the workload when they began their programs. They were provided student testimonials, frequently asked questions, school catalogues, as well as student expectations. With all of the documentation that was provided, they were fully aware of what to expect when they started the program.

An additional shared experience between all three students was their exposure to their cohort groups. While the students felt that they were given ample time to interact with their cohort groups during the on-ramp period, they wish that they would have been provided some additional information on their peers, as well as on those who were in cohorts before them. This information could have provided valuable insight into the skill levels of their future peers, as well as allowed them to see the results and experiences of previous students. To this extent, some of the students felt that a more selective admissions process would lead to more successful cohort groups.

The final item that was apparent across all three experiences was the on-ramp period. All three students felt that this process was beneficial to their learning curve during the program. The on-ramp periods allowed for the students to bond with the fellow members of their cohort group, and at the same time begin to build their knowledge base. However, there were also shared ideas on what could be changed during this process. It was made clear that the pre-work during this period should be mandatory. Students who dropped out of their cohort more often than not were students who did not complete their pre-work. Along with pre-work being mandatory, there was recommendation that this work be more technical in nature. Students felt that at times they felt overwhelmed by all the tools at their disposal, and that the on-ramp period would be a perfect opportunity for students to become acclimated to items at their disposal. All students noted that though there are improvements that can be made, both institutions were extremely transparent when it came to expectations of the student; and that ultimately the responsibility is on the student to be prepare themselves with the information that they are provided.

The former students also gave testimonial that helped to inform further Task Force discussions and actions. Students who achieved positive outcomes following graduation noted that the most important features of the program were: soft skills, communication with program staff as an alumni, and end products from cohort/group-based projects and activities.

When speaking with the Task Force, all three students agreed that soft skill integration was a key component of their post-graduation outcome success. These soft skills prepared the students for working in a team environment, and allowed them to demonstrate to employers that they possess the

equivalent of on the job experience. By demonstrating that they have worked collaboratively in groups for extended periods of time, the students felt confident and prepared when meeting with potential employers. There was a common thought amongst the students that a traditional university would not have provided them with this level of preparation. The students noted that even though the schools provided them with these skills, it was up to the student to be responsive and to make themselves open to critique and feedback.

Another component that led to successful outcomes for students was the level of communication with program staff after graduation. All three students noted that they were in constant communication with staff and were provided with general career support, breakout sessions, meet and greets, and seminars hosted by previous graduates. In particular, the seminars discussed topics that the previous graduates wished they would have known when beginning their search for employment. The panel was in agreement that they felt completely supported by their school, and that they were provided with ample resources while on their search for employment.

The final component that the panel made particular mention of was the end products of working with their cohort groups. The three students noted that there were pros and cons to working on a collaborative project with their cohort group. They noted that it is a benefit to be able to take a deliverable to a prospective employer, and present it to them. Students are able to discuss with the employer how they would change the project if they were completely in control of the final outcome. The students believed that this allows them to sell their unique viewpoints and skills to the potential employers. Conversely, there was commonly held belief amongst students that if you were in a low performing cohort group, that you would not be able to obtain a quality job. Students mentioned however that program staff mitigate this concern by focusing the students on the project itself, and not post program employment. While this did not completely remove the tension surrounding potential employment, the students did appreciate the staff's efforts to maintain student focus throughout the cohort project period.

Employers of Graduates Testimony

Employers of graduates also shared their expertise to the Task Force in regards to what steps California can take to help strengthen and expand the high technology workforce. Though each company offers different products and services, all agreed upon the following ideas: the demand for workers in the high technology industry makes it difficult to retain talent; and that a high level of communication between employers and schools is necessary.

When speaking to the Task Force in regards to talent retention, it was clear that all three employers struggle to maintain a qualified staff. The three companies stated that it can often be hard to fill positions with qualified candidates due to the constantly evolving nature of the industry. It was noted that the most successful candidates are the ones who can balance the soft skills with the technical skills, noting that graduates from these institutions typically can do this a bit better than other applicants. Another aspect that makes it difficult for smaller startups to retain talent is the poaching of employees

by larger firms. Graduates come to startups as entry level web developers, and within a few months they develop more refined skills that appeal to larger companies. In particular, Thoughtbot experienced over 50% turnover in 2014. While dealing with high turnover and the difficulties of finding qualified applicants is frustrating, they noted that this is partially due to the fact that graduates are entering the marketplace with a solid baseline level of knowledge.

When discussing the skills that graduates are entering the workforce with, the three employers made note of the level of communication that they keep with the schools. In particular, Branchbird noted that they provide feedback on the graduates that they hire, as well as those that they don't. All three employers agreed that communication between companies and the schools is necessary if students are to be kept on the cutting edge of technology. All three companies believed that employers are the pulse of the high technology sector, and are the best source of knowledge of what the trends are in the industry. Along with this communication, it was noted that maintaining a high level of selectivity for cohorts will ensure that graduates are kept at their current level of quality, and will prevent a saturation of the talent pool. Given these items, all three employers agreed that there is still a high demand for employees, and that supply cannot keep up.

BPPE Testimony

To better understand the next steps that California can take to foster growth within the high technology sector, the Task Force looked to the BPPE to provide expertise on the matter. The Task Force first spoke with the Licensing Chief of the BPPE, Leeza Rifredi. While hearing the testimony, it became clear that there are multiple steps that a prospective school must take before becoming a Bureau approved institution; as well as when there are changes made to an existing school.

Ms. Rifredi began her testimony by stating that when the Bureau receives an application it is reviewed within thirty days by a licensing analyst. This initial review is for completion only, and not for compliance; it was noted that most applications that are received are incomplete, and that this is one of the major culprits of the Licensing Unit's backlog. After the review of the application, if it is deemed incomplete a deficiency letter will be sent to the applicant. Once corrections have been made and there is a completed application on file, it will go to a queue for review by another analyst. When the application reaches an analyst it undergoes a thorough compliance review, ensuring it meets all Bureau standards. If there are deficiencies a letter will be sent notating the needed corrections, with a timeframe of thirty days for response. Within two weeks of response, the application will be reviewed again for compliance. Once this review is complete the analyst will determine if there is a need for a Quality of Education review. A Quality of Education review is typically required when the applying school does not have any approval to operate from a different licensing entity, i.e. an accreditor. The Quality of Education Unit will review the following items: admissions requirements, projection of enrollment for the first three years, descriptions of each program, access to distance education platforms, how assignments are graded, skills and competencies that graduates will have, make-up of the faculty, facility and equipment available to students, job outlook, and how the institution plans on maintaining data on graduates employed in the field. If the application is still deficient but only has a

minor issue, the Education Specialist will reach out to the applicant; if there is a major issue the application will be prepared for denial, followed be a deficiency letter.

While continuing with her testimony, Ms. Rifredi noted that there are additional types of applications that the Bureau receives; ranging from new locations, change in ownership, or a change in educational objective (addition/removal of an offered program). In regards to schools in the high technology sector, the Bureau anticipates there being a great deal of changes in educational objectives, due to the fluidity of the industry. Because of this, the Bureau views these applications as a non-substantive change, which has a much shorter turn time, allowing for students to be kept on the cutting edge of technology.

When discussing the reporting of student outcomes, the Task Force reviewed whether it is applicable to have High Technology Programs using the current format of the School Performance Fact Sheet (SPFS). The Task Force turned to Matthew Wiggins, BPPE, to provide an overview of the current format of the SPFS and proposed regulations that will affect the SPFS.

Mr. Wiggins informed the Task Force that currently High Technology Programs are expected to use the same SPFS format/content that all other institutions currently use. With this information in mind the Task Force decided to review the various components of the SPFS and the proposed regulation changes. While reviewing the different components it became apparent that there were multiple sections that were not relevant to High Technology Programs. These sections in particular are the 150% Completion Rate Table; Licensure and Exam results; and the Federal Cohort Default Rate data. These were deemed irrelevant due to the fact that there is not an opportunity for students to finish outside of their cohort's completion date (student are required to start the program over if they are not able to keep pace); there are currently no State of California Licenses/Exams required for these programs; and currently High Technology Programs do not receive Federal Financial Aid. Mr. Wiggins also informed the Task Force of the proposed regulation changes that pertain to uniform reporting requirements. The proposed changes would include a new definition for "Gainful Employment", including self-employment documentation requirements; removal of portions of the Placement Rate Table; and require institutions that do not qualify for Federal Financial Aid to have a verbatim disclosure stating as such.

Subject Matter Expert Testimony

Throughout the process of hearing various testimonies, the Task Force also looked to public comment for input around the student reporting recommendations. A consistent theme that was heard from various public advocates was the need for more reliable wage data. It was mentioned that currently institutions rely on self-reported student wage data (salary, employment status, etc.) gathered via surveys, emails, and various other outreach methods which only display wages at the time a graduate is hired. While these methods have been the norm for multiple years, the Task Force decided to review alternate methods of collecting this data in order to ensure data integrity, and to reduce the burden of work for institutions.

One of the specific recommendations from public comment was in regards to a web based program called Salary Surfer. Salary Surfer is provided by the California Community Colleges Chancellor's Office

(CCCCO), and is viewed in the industry as a valuable tool to both students and regulators. According to the CCCCO, Salary Surfer "uses the aggregated earnings of graduates from a five year period to provide an estimate on the potential wages to be earned two years and five years after receiving a certificate or degree in certain disciplines." [6] The program receives its data by providing social security numbers of graduates to the Employment Development Department (EDD) and matching it to a Base Wage File. This file will show if a given social security number has any reported earned wages for a given quarter of the year. This information is transmitted to the CCCCO, and is then analyzed and presented in its current form. With this information presented to them, the Task Force decided to review the foundations of this program, and to determine the feasibility of a similar program being used to report outcomes for students who attend High Technology Programs.

In order to accomplish this objective, the Task Force heard testimony from Patrick Perry, Senior Research Associate at West Ed, who performed a pivotal role in the development of Salary Surfer. Mr. Perry began his work on Salary Surfer while working for the CCCCO. He noted that the main goal of creating this program was to provide valuable data to students and help them make well informed decisions; and he sees no reason why the same approach cannot be taken for private postsecondary institutions, in particular High Technology Programs. He noted that there are three main benefits when it comes to using Base Wage data as it pertains to private postsecondary and High Technology Program institutions: an increase in data reliability; the ability to compare the wages of graduates from various institutions across California; and the removal of the burden of reporting from institutions.

As previously noted, data reliability is always a concern when reviewing outcomes reported directly from students and institutions. Mr. Perry stated that by using a Base Wage data program this concern is greatly minimized. Schools would submit a roster of social security numbers to the Bureau who sends this data to EDD to determine if there is a "match". A match would result when a given social security number shows a record of earned wages for a given quarter in the year. When there is a match this information is returned to the Bureau where they are able to determine the wage that a graduate has earned after program completion. This data would then be provided back to the institution for inclusion on their School Performance Fact Sheet (SPFS). The data can be organized in such a way (CCCCO displays wage data two years prior to graduation, two years post-graduation, and five years post-graduation) that allows students to see not what wage they will earn as soon as they graduate, but expected wages as they develop within their career. By providing students access to a potential career trajectory, students are able to make a better informed decision when it comes to choosing a school and career.

The second point that was brought to the Task Force's attention was that using a model like this will allow students to compare the wages of graduates from different institutions side by side. While this data would be disclosed on an institution's SPFS; it could also be made available on a website operated by the Bureau. Students would potentially be able to look at similar programs from various schools and view the earnings of their graduates over the course of their careers. By presenting the data in this fashion, students would be exposed to this information while reviewing all of their school choices, rather than when viewing the data when they are provided the SPFS. By presenting prospective

students with this information on demand, they will be able to compare their options at their convenience and make a choice that best fits them.

Finally, it was made apparent that a system such as this would reduce the amount of workload that is required of schools when compiling their SPFS. By minimizing the amount of time and resources spent on outreach, tracking, and follow up; schools will be left with a smaller burden of responsibility and will simultaneously be providing more reliable data to their students.

Conclusion

TBD

Appendix:

[1]*Background Paper for the Bureau for Private Postsecondary Education (Joint Oversight Hearing, April 21, 2014, Senate Committee on Business, Professions and Economic Development, Senate Committee on Education, Assembly Committee on Business, Professions and Consumer Protection and Assembly Committee on Higher Education)*

[2]*Creating Pathways to Better, Well-Paying Tech Jobs and Meeting Urgent Employer Demand Across the U.S. (TechHire Initiative)*

[3]*The TechHire Opportunity (TechHire Initiative)*

[4]*The TechHire Opportunity (TechHire Initative)*

[5] *Bureau Representatives: Leeza Rifredi – Licensing Chief; Matthew Wiggins – Associate Governmental Program Analyst*
Institution Representatives: Scott Zaloom – Senior Regional Director, General Assembly; Jon Stowe – President, Dev Bootcamp
Former Students: Leslie Forman – General Assembly; Santiago Gomez Lavin – General Assembly; Patrick Reynolds – Dev Bootcamp
Employers: Matt Bendett – Co-Founder, Peerspace; Kim Gerard – Technical Lead, Branchbird; Dan Croak – CEO, Thoughtbot
Subject Matter Expert: Patrick Perry – Senior Research Associate, WestEd

[6]*Salary Surfer, www.salarysurfer.cccco.edu*