

ETP Electronic Record Keeping Requirements

ETP Policy Committee

October 29, 2020

Electronic Records are the Future

Objective: To provide the Policy Committee an observation of ETP electronic record keeping/LMS rules and to propose modifications that will simplify ETP reporting that ultimately benefits applicants and improves the program.

Background: Most training organizations, employers and colleges have moved from traditional, paper-based training tracking systems to electronic attendance records, Learning Management Systems (LMS), and/or training databases. ETP's electronic record keeping rules have been updated over the years but there are other modifications that, if adopted, would align ETP rules with industry best practices and simplify compliance reporting. **Updating these rules in advance of designing/rolling out Cal-E-Force is highly recommended.**

ETP Records Past and Present

Past

- ❑ Original training attendance rosters stored in one central location and available for staff review.
- ❑ ETP specific data was required on a pre-approved trainee attendance roster that included: location, course name, training type, duration, start/end time, trainee/trainer name(s), others.
- ❑ Original daily rosters required for deliver of all training types including class/lab sessions, CBT, and Productive Lab.
- ❑ Time adjustment for breaks, lunch hour, and other anomalies required on the original rosters as well as make-up session notations

Present

- ❑ ETP will accept training attendance recorded in a Learning Management Systems if the data points depicted in the contract boilerplate are tracked.
- ❑ LMS systems are pre-approved during the application development process via questionnaire filled out by the applicant with a demo of system capabilities for staff
- ❑ Documents used to “input” and/or “update” the LMS are not required for staff review during the contract term
- ❑ Staff can request structural changes to the LMS to meet ETP rules if a datapoint is missing and/or deny the option for electronic records
- ❑ ETP electronic recordkeeping rules have improved over time but aligning the rules to industry best-practices is highly recommended

Electronic Records and LMS for Recording ETP Funded Training Attendance - Questions

1. **Fact Check:** Electronic records are replacing paper records
2. How can staff ensure that electronic training records stored in an LMS are accurate?
3. What training data points are critical to ensure compliance with ETP rules and the fixed fee payment schedule?
4. How will new training methods such as virtual reality, blended training, webinars, others be recorded in an LMS and funded by ETP?
5. What are the core advantages to LMS systems over paper records?
6. How can ETP metrics for instructor-trainee ratios, training methodology caps, and other metrics be managed more effectively?
7. What advantages does electronic records provide to ETP to ensure program compliance and reduce staff time?

Recommendation

Hastened by the pandemic there is a move to electronic records across all industries because the benefits are clear. Accepting training attendance recorded in an LMS must become a standard policy. ETP should take the opportunity to eliminate unnecessary reporting and identify only the training attendance data points required to prove training was delivered and to integrate only those datapoints into Cal-E-Force. Qualitative review of an applicant's training should continue through the periodic ETP staff monitoring visits.

Electronic Record Recommendations

- ❑ **Encourage Applicants to use Electronic Records:** The advent of cloud computing has moved IT systems that store electronic records from the “client-server” world to any device (cell phone, iPad, laptop). ETP should encourage applicants to use electronic records instead of paper records whenever possible because the training attendance data stored in an LMS is both accessible and secure.
- ❑ **Expand the List of Pre-Approve Electronic Record Keeping Systems:** Expand the list of all previously approved “off-the-shelf” electronic LMS and record-keeping databases. These previously approved electronic recordkeeping systems should be automatically approved for applicants and the name of the approved system depicted in the ETP application. LMS systems approved by other regulatory bodies a factor in the approval of electronic records for an applicant. Publish the list approved LMS’s on the ETP website.
- ❑ **Simplify Electronic Recordkeeping Requirements in the Boilerplate:** If some or all the proposed recommendations are adopted the policy committee, ETP’s legal staff will need to modify the contract Boilerplate accordingly: A possible revision to the key section would read “The LMS must be capable of producing electronic reports by trainee with the following information: 1) trainee name; 2) training dates; 3) attendees; 4) duration/time; 5) type of training; and 6) training delivery method.
- ❑ **Limit Changes to LMSs made by Staff for ETP reporting:** It is cost prohibitive and against industry-best practices for an applicant to make structural changes to an LMS for any limited-term contract or project. Request by staff to alter, modify, and change an LMS interface should be extremely rare.
- ❑ **Make Instructor Names an Optional Field:** Many applicants with LMSs are not tracking the primary or co-instructor name(s) because they see no value in doing so. Trainers qualifications are vetted far in advance of scheduling a class session by the applicant. The agency has rarely if ever denied ETP reimbursement due to trainer qualifications. ETP is required to calculate the trainee/trainer ratio but this can be done in an LMS without the instructor name field being populated. Instructor qualification certifications in section “2.12 Trainer Credentials” is currently in the Contract boilerplate and that should be sufficient.

Electronic Records Recommendations

- ❑ **Accept Excel Data for Electronic Records Reporting:** Once an LMS has been approved a contractor can provide data reports in Excel for staff review. From the Excel data report staff can assess all contract performance and compliance requirements. This is easier than providing “screen shots” from the LMS or PDFs of rosters.
- ❑ **Eliminate Daily Training Attendance Reporting:** ETP rules requiring daily training attendance reporting are cumbersome and unnecessary. Most training tracking systems, paper-based or on-line, do not track each day a course is delivered. Instead, they track “start date”, “end date” and “duration” for each course delivery/session. Eliminating the daily attendance tracking mandate would significantly reduce contract administration busy work and save time. The contract boilerplate has been modified to allow for multi-day reporting, but Cal-E-Force has not.
- ❑ **Use Training Types in Course Crosswalk Reports rather than Course Name:** Course names recorded in an LMS can be confusing because of industry nomenclature, course field and code options, and other factors. Adding new course names via a contract modification creates extra work for applicants and staff. ETP’s “Type of Training” categories include: “computer skills”, “continuous improvement”, “manufacturing skills”, etc. and course names can be assigned one of ETP training types and depicted in the crosswalk report. Ineligible courses in harassment, orientation, and/or government mandated can be flagged as ineligible in the cross-walk report.
- ❑ **Allow for Averages for Training Hour Caps:** Caps for training hours by delivery methodology (CBT, PL, and Class/Lab) require too much staff time to monitor and bring minor consequences. Because trainees have diverse experiences, aptitudes, and education levels the training they require to do a job varies greatly. A better alternative would be to hold contractors to averages for each cap that would be presented to Staff at the contract close out. Adjustments to final payout of funds can be made if averages are out of balance.

Program Recommendations

- ❑ **Adjust Fixed Fee Reimbursement Rates** : Due to the pandemic there will be less classroom instruction and more on-the-job training, distant learning, webinars and asynchronous/synchronous WBT. Additionally, there are new training methodologies emerging in virtual and augmented reality that the Panel should fund. Staff should consider simplifying the fixed-fee reimbursement schedule to reduce complexity, save staff time, and ease the role-out of Cal-E-Force.
- ❑ **Conduct Monitoring Visits Virtually**: Web conferencing tools like zoom, go-to-meeting, webex, etc. provide the opportunity to view LMS systems in real time. Trainee interviews can be performed via zoom minimizing the disruption to business. Some administrative consultants are given read-only access to an applicant's LMS and provide staff with ad-hoc records upon request.
- ❑ **Align Post-Contract Audits and Staff Monitoring Visits**: Post-contract audits and annual staff monitoring visits are highly effective to ensure compliance with ETP rule and to meet program goals. Audits managers should review staff contract monitoring procedures to identify ways to align staff monitoring procedures and program goals.
- ❑ **Perform Trainer-to-Trainee Ratios Monitoring at the End of the Contract**: The train-to-trainer ratio directive requires too much ETP staff time to monitor and provides the agency little results. A strict interpretation of this rule requires ETP staff to deny reimbursement for a training session with 21 attendees but allow funding for a similar session with 20 attendees. A much better, logical alternative is to require a Contractor to meet an average Training Ratio across the term of the ETP contract or eliminate ratios all together.
- ❑ **Cal-E-Force and LMS reporting**: The agency can align its own training tracking database to industry standards and simplify reporting by adopting these recommendations.