



Employment Training Panel

Memorandum

To: ETP Policy Committee
Gretchen Newsom, Chairperson
Janice Roberts, Member
Rick Smiles: Member

Date: December 17,
2020

CC: Executive Staff
Reg Javier, Executive Director
Peter Cooper, Assistant Director

From: Lis Testa, Policy Manager

Subject: ETP Policy Committee Meeting Agenda Item 3.a.3.
Report to Policy Committee Re: Electronic Record Keeping

I. Brief Issue Statement:

At the October, 2020 Policy Committee meeting, Phil Herrera gave a presentation on electronic record keeping and learning management systems (LMSs). This was a follow up to his original presentation on the same topic.

The focus of this presentation was to provide the Policy Committee with information on how typical Electronic Recordkeeping systems (a.k.a. Learning Management Systems) work. Mr. Herrera explained that most organizations have moved to the use of LMSs for their recordkeeping requirements. He reviewed ETP's past and current practices in regards to accepting LMSs for recordkeeping. He posed a series of questions that should be considered when looking at if and how ETP can shift to further rely on LMSs, rather than on paper rosters. He then presented a series of recommendations for ETP to review and perhaps to incorporate into our LMS policies in the future.

Stakeholder comments aligned with many of the requests and suggestions in Mr. Herrera's presentation, although not all stakeholders were in agreement on all items; for example, some would like LMSs to become ETP's default, while others still require paper rosters.

This memo will go over a few of the items from Mr. Herrera's presentation.

II. Potential Options:

- 1) ETP's Record Keeping Requirements: these are spelled out in Regulations 4442 (Record Keeping) and 4442.2 (Record Keeping Modifications). A copy of these regulations are attached for reference. Any alterations we make to our Record Keeping requirements (electronic or paper), must stay within the requirements of the Regulations.
 - a. This means that the following stakeholder requests will unfortunately *not* be able to be implemented:
 - i. The Trainer's name is a required element of record keeping which cannot be removed;
 - ii. Training must be logged in hours per day, not hours per week;
 - iii. Course name must be recorded. Training cannot be tracked via training type;
 - iv. Caps on training hours need to remain at the per trainee level, rather than averaged;
 - v. Ratios must also be tracked per course, rather than averaged.
 - vi. Using Excel sheets for Rosters.
- 2) ETP Requesting to Modify Contractor's Existing LMSs: Staff understands that requesting modifications to existing LMSs can be challenging, time consuming, and costly for contractors. These requests are only made when both the contractor desires to use an LMS for record keeping, *and* the LMS does not meet ETP's regulatory or security requirements. In these instances, contractors can either modify their LMS to meet ETP's requirements, or they can use the regular rosters already available. The use of regular rosters is always an option.
- 3) Building a LMS into Cal-E-Force: At this time, there are no plans to build or 'add-in' an LMS into CEF. In the future, we are considering developing an API, or Application Programming Interface, which will allow CEF to interact with other external programs/operating systems (such as external LMSs). This will reduce the manual data entry requirements for contractors, adding convenience and efficiency to our process.
- 4) Expanding Pre-Approved LMS list: ETP does not have a pre-approved LMS listing. Each time an LMS is used, staff verify that it meets our record keeping and security requirements. Even when a repeat customer comes back using the same LMS as they did on their last contract, we still check that the LMS meets our requirements, since the features of the LMS may have changed since the contractor last had an ETP project.
- 5) Items Already in Place:
 - a. ETP staff have been performing all monitoring visits virtually since the start of the COVID pandemic. Once the pandemic has resolved, we can continue to conduct monitoring visits virtually, however, there are some instances when an in-person monitoring visit is necessary or desirable.

- b. Adjusting reimbursement rates is something that ETP does on at least a yearly basis, when preparing for the next fiscal year. This practice will continue.
- c. Alignment between audits and monitoring already exists, and each stage is concerned with unique tasks. That being said, staff can look for ways to bring audits and monitoring even more into alignment as our policy work continues.

III. Recommendation:

Staff would like to know if Committee has any questions on this item. No action by Committee is necessary.