



California Community Colleges

MEMORANDUM

February 19, 2020

20-003 | Via Email

TO: Chief Executive Officers
Chief Instructional Officers
Chief Student Services Officers
Chief Business Officers
Chief Information System Officers
Career Education (CTE) Deans
Administrators of Occupational Education
Admissions Officers and Registrars
Regional Consortia Chairs

FROM: Sheneui Weber, Vice Chancellor
Division of Workforce and Economic Development

CC: Sandra Sanchez, Assistant Vice Chancellor, Workforce and Economic Development
Javier Romero, Dean, Workforce and Economic Development
CCCCO Staff

SUBJECT: Guidance on Apprenticeship Attendance Reporting

In June 2018, AB 1809 (Higher Education Trailer Bill 2017-18) was signed into law and added Education Code Section (ECS) 79149.1 which changed two items around apprenticeship:

- 1) How to report apprenticeship attendance in the community colleges and receive reimbursement, and
- 2) What fees apprentices could be charged

This memo provides guidance on how to apply these changes.

1) REPORTING APPRENTICESHIP ATTENDANCE & REIMBURSEMENT

The former Ed Code language provided a single option for reporting apprenticeship attendance and receiving reimbursement from the state (using form CCFS-321 and RSI funding), which is at the minimum FTES rate. The new Ed Code Section 79149.1 language adds an additional method using form CCFS-320 and FTES apportionment. This change allows for the attendance of apprentices enrolled in any class offered for community college credit by a community college, as part of state approved apprenticeship training program, to be reimbursed at the per credit FTES funding rate.

Apprenticeship Attendance Reporting

February 19, 2020

It should be noted, that this change was intended to incentivize community colleges to utilize their quality programs to support and develop state approved apprenticeship training program. Community colleges currently in partnership with an apprenticeship program sponsor may continue to be reimbursed at the RSI rate. With the change, there are now two ways of reporting apprenticeship attendance & receiving reimbursement:

Option 1): Use of CCFS-320 for reporting apprenticeship hours of attendance as a part of general attendance apportionment (FTES) under ECS 84750.5 (the newly allowed method), or

Option 2): Use of CCFS-321 for reporting apprenticeship related and supplemental instruction (RSI) under the provisions of ECS 79149.3 (previously the only allowed method).

Option 1) Using CCFS-320 for apprenticeship reporting and FTES reimbursement

Apprenticeship attendance may be reported for reimbursement on the CCFS-320 when both of the following criteria are met:

1. Instruction is provided to indentured apprentices by a program approved by the Division of Apprenticeship Standards of the Department of Industrial Relations, **and**
2. A community college faculty member as defined in education code teaches the classes.

Apprenticeship attendance in classes that do NOT meet both of these criteria must be reported on the CCFS-321 (option 2). Please note, if the CCFS-320 2-part criteria is met, a college with an existing partnership with an apprenticeship program may still choose to also report apprenticeship attendance on CCFS-321.

Building and Construction Trades: Before using the CCFS-320 for reporting apprenticeships, please note that a section of AB1809 (ECS 79149.3(k)) provides the following regarding community college contracts with apprenticeship program sponsors *in the building and construction trades*:

- Apprenticeship program sponsors must approve any decision to seek reimbursement for classes based on FTES reporting on the CCFS-320.
- A community college may not condition its willingness to contract with an apprenticeship program sponsor in the building and construction trades, to grant community college credit for a class provided by such a program, based on the form of reimbursement preferences of the program sponsor.
- Districts choosing to report apprenticeship hours on the CCFS-320 must report all of the following information to the Chancellor's Office for each apportionment period:
 1. Total FTES generated by apprentices enrolled in apprenticeship courses reported on the CCFS-320 (broken down by course section).
 2. Total number of hours of apprenticeship instruction reported on the CCFS-320.
 3. The total amount of apportionment received for apprenticeship instruction reported on the CCFS-320.

Apprenticeship Attendance Reporting

February 19, 2020

The correct form for this reporting is titled *Apprenticeship Attendance Reported on the CCFS-320* and may be found on-line at <https://www.cccco.edu/-/media/CCCCO-Website/Files/Workforce-and-Economic-Development/ccfs-320-apprenticeship-reporting-a11y>.

The form is to be submitted to the Workforce and Economic Development Division's Apprenticeship Program for each apportionment period.

Course sections to be reported on the CCFS-320 may be scheduled as Weekly Census, Daily Census, or Positive Attendance sections. Colleges are responsible for determining if they meet the criteria for that chosen attendance accounting method. These course sections may enroll both apprenticeship and non-apprenticeship students.

Note that a college may limit enrollment in a course, or course section, to be reported on the CCFS-320 solely to apprentices, if that course or course section is required for those students as a part of an apprenticeship program registered with the Division of Apprenticeship Standards of the Department of Industrial Relations. [ECS 79149.1(g)]

Option 2) Using CCFS-321 for apprenticeship reporting and RSI reimbursement

There is no change in procedure for reporting hours of Apprenticeship Related and Supplemental Instruction on the CCFS-321. Course sections whose attendance will be reported on the CCFS-321 will continue to be scheduled as Actual Hours of Attendance (Positive Attendance) sections.

2) APPRENTICE ENROLLMENT FEES & COMMUNITY COLLEGE REIMBURSEMENT

Per AB 1809:

1. Attendance in apprenticeship courses reported on the CCFS-320 will be reimbursed through the regular apportionment funding system used for all community college attendance.
2. Attendance in apprenticeship courses reported on the CCFS-321 will be reimbursed from RSI funds, with any excess costs beyond available RSI funds to be paid by the program sponsor. FY 19-20 approved RSI reimbursement rate is \$6.45 per hour.
3. No apprentice will be charged the \$46 per unit enrollment fee, or nonresident tuition, for any course taken as part of an approved DAS apprenticeship program, whether the student's attendance is reported on the CCFS-320 or CCFS-321. (ECS 76350). This is a change in procedure for some community colleges, and may require modifications to your enrollment and tracking systems for students in apprenticeship programs.
4. Apprentices who enroll in community college courses that are **not** part of an approved apprenticeship program will be required to pay the \$46 per unit enrollment fee (and nonresident tuition, if applicable) for those courses unless otherwise exempted.

If you have questions regarding this memo, please contact Nick Esquivel at nesquivel@ccco.edu.