TCS 10.07 Waiting List Guidance Frequently Asked Questions

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Project Goal

Ensure compliance with TCS10.07 for all colleges and establish clear and consistent program enrollment policies.

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WAITING LIST ADMINISTRATION

Purpose of a Waiting List per TCS10.07

Waiting lists enable institutions to track "district and non-district state residents who are not admitted because of program capacity limitations." Maintaining a current waiting list ensures that when program capacity limitations permit, individuals can be effectively admitted to programs.

Offering the Waiting List Option

Per TCS10.07, "district and non-district state residents who are not admitted because of program capacity limitations shall be notified of their non-admission in writing and of the option to be included on a waiting list."

When to Start the Waiting List

Per TCS10.07, at any time there are capacity limitations, the college is required to establish a waiting list. If students cannot access core program-level courses (e.g., occupational or technical courses), initiate the waiting list process. There is local flexibility in how your college goes about this process. Please see our explainer video on starting a waiting list.

Eligibility for Individuals Without a High School Diploma

If individuals without a high school diploma can apply to a program, they may be eligible to join the waiting list.

Student Status Terms

Admitted: Pre-Core
Student is admitted to the program and on waiting list for available space in core courses and has met all admissions requirements but not the academic preparedness criteria.

Admitted: Core Ready

Student is admitted to the program and on waiting list for available space in core courses and has completed all admissions requirements and academic preparedness criteria, if applicable. Has priority over all other applicants in subsequent terms based on date of admission and residency status.

Admitted: Core Active

Student is admitted to the program and should be enrolled in core courses.

**In the "Wisconsin Technical College System Waiting List Guidance for Limited Programs" document, the 'Waiting list Process' section refers to admission to the program and this equates to students who are in the "Admitted: Core Active" status.*

MEETING ACADEMIC PREPAREDNESS REQUIREMENTS

Admission criteria vs. academic preparedness requirements

Admission criteria encompass items for admission to the institution (e.g., transcripts, multiple measures criteria). Academic preparedness requirements are program-specific and contain what is outlined under state licensure and accreditation requirements and what is needed to help a student prepare for the program curriculum (.e.g, prerequisite courses, general education requirements, testing) Academic preparedness requirements

may also include clinical and/or program requirements such as background checks, drug screening, etc.

Programs in which academic preparedness is required prior to start of any classes

For programs like aviation, CDL and advanced technical certificates, where criteria for licensing or accreditation is required before taking any courses, the college will communicate with students about admissions once these requirements are submitted/completed. This includes information about course enrollment and/or opting into the waiting list, if applicable. These requirements are still considered 'academic preparedness criteria,' and the waiting list is ordered by the college/program application date or the date the application is deemed complete.

Application Timing

Students can apply to a program before completing all admission criteria, including the program's academic preparedness requirements.

Satisfying Criteria While on the Waiting List

Students can work on satisfying academic preparedness requirements while on the waiting list (e.g., "Admitted: Pre-Core" and "Admitted: Core-Ready"). If a college uses the application submission (not completion) date, then students can also work on satisfying admission criteria while on the waiting list.

Standard for Academic Preparedness Requirements

Academic preparedness requirements must only include the *minimum* of what is outlined under state licensure and accreditation requirements and what is needed to help a student prepare for the program curriculum. Any requirements above this minimum can have disproportionate and discriminatory effects on students from historically excluded backgrounds, and thus must be avoided.

Exam Costs

Exams like HESI or TEAS used to satisfy academic preparedness requirements should be available at no or limited cost to students. Financial assistance should be provided to those who need it. For instance, federal Perkins Act funding can cover out of pocket costs for students who are members of special populations, including economically disadvantaged students. Academic preparedness requirements must only include the *minimum* of what is outlined under state licensure and accreditation requirements and

what is needed to help a student prepare for the program curriculum. Any requirements above this minimum can have disproportionate and discriminatory effects on students from historically excluded backgrounds, and thus must be avoided. Testing may be used to determine if students meet minimum standards but shall not be used to establish a ranked order for the waiting list.

Civil Rights Compliance Review

Academic preparedness requirements must only include the minimum needed to prepare for the program curriculum to avoid disproportionate impacts on students from historically excluded backgrounds. This will be reviewed as part of the civil rights compliance review. Each college is reviewed on a rotating basis.

CHANGING LOCAL PROCESSES

Using a Petition Process

Colleges may not use a petition process instead of a waiting list or in addition to a waiting list.

Establishing Local Waiting Lists for Other Purposes: Special Circumstances Policy

For special circumstances, the college must submit a special circumstances policy to the System Office for Board approval. Colleges could have specific special circumstances for a program and, if applicable, special circumstances that could apply to multiple programs given the populations they are supporting (e.g., prioritizing military-connected, active-duty students). Special circumstances may not conflict with state statutes or administrative code. For example, **a special circumstance policy may not redefine the state residency requirements as defined under TCS 10.07(2) to (5).**

How this would work in practice:

1. In-District: develop a special circumstances policy to hold a reasonable number of spots for in-district students within a special circumstances policy (e.g., employer-sponsored, 2+2 program student).
2. Non-district state residents: In-state students are typically just disadvantaged in their first enrollment cycle in terms of priority. After this cycle, they have the same priority as in-district students and have a good chance of getting into the program. Colleges can develop a special circumstances policy that holds a reasonable

number of spots for in-state students, who are in their second enrollment cycle *and have not yet gained access to core program courses*.

3. Out-of-state: since these students 'shall be admitted to district programs, after district and non-district state residents, as spaces remain available', special circumstances policies cannot be used to hold spots in a program with a waiting list for out-of-state students.

Submitting Special Circumstances Policies

To submit a Special Circumstances Policy (SCP), complete and email the Special Circumstances Policy Form and, if needed, the accompanying SCP spreadsheet to programs@wtcsystem.edu. These forms are found on the Educational Services Manual myWTCS webpage under "TCS 10.07 Related Guidance."

File naming convention:

- File names must follow this format: College Acronym | Special Circumstances Form | Type of policy (e.g., program name or student population) | Year in which the policy will take effect
- Examples:
    - MDSN Special Circumstances Form Practical Nursing 2025
    - CVTC Special Circumstances Form Post-High School Academy 2025

If the submission will overwrite an already approved Special Circumstances Policy, please provide this information in the email message.

Reasonable Number of Program Spots

For special circumstances policies, these can hold a reasonable number of program spots, which can be as many as 49% of the program spots.

Employer/Agency Sponsorship

When providing special circumstances policies to our office for review, please ensure that these accurately reflect what is occurring at the college. For instance, if the college is reserving program spots for bilingual students, but in practice these students all come from one employer/agency then please submit the special circumstances policy with this specificity (bilingual students from X employer). If the college is reserving program spots for an employer/agency then this **must** be conducted via contract training (s. 38.14(3)).

Shared Programs

Under TCS10.07(6), programs co-sponsored by multiple districts are termed "joint programs." In such arrangements, the districts involved can decide on the number of students each district can enroll as residents for the program's location. The process involves each college maintaining a waiting list as per TCS10 guidelines. Admission to core courses is then based on the order of these waiting lists and the agreed-upon enrollment numbers from each college outlined in the joint program agreement.

In some shared programs with specific accreditation requirements, it may be necessary for the Primary College to solely initiate and maintain the program's waiting list. Admission to core courses is then based on the order of the Primary College's waiting list and the agreed-upon enrollment numbers from each Cooperating College outlined in the joint program agreement. Always verify with your accreditor regarding these policies to ensure full compliance with accreditation standards and requirements.

Programs vs. Course Waiting lists

If new students are unable to access their required occupational/technical courses, a program waiting list should be initiated. However, if only one or a few courses are full and students can still enroll in other core courses, the course waiting list process should be used instead. When the full course is later in the program, it does not impact new students' access to core courses, so this situation should also follow the course waiting list process.

Priority Enrollment for Veterans & Service Members

In statute 38.12(12) active-duty service members are given priority for enrollment in courses. If your college would also like to give priority order for service members and/or veterans for program enrollment, then this would need to be submitted as a Special Circumstances Policy to the System Office for approval.

Deployed Military Students & Residency

- statute 38.22(4)(b)2 students who are relocated to WI for active-duty service are considered 'in-state' for tuition and program admission purposes
- Ensuring that everyone is on the same page regarding the reenrollment of service members:
    - Federal Law: Section 484C of the Higher Education Act of 1965, as amended (20 U.S.C. 1091c) requires institutions participating in Title IV Federal student financial aid programs to readmit service members with the same

academic status they had before deployment, ensuring minimal disruption to their education
    - State Law: 38.12(13) students who are members of the National Guard or reserve units of the U.S. armed forces and withdraw from school due to being called into active duty can reenroll in the semester they are discharged or the next semester, based on their preference. And have priority registration for courses.
- TCS10.07 waiting list impact: Please keep deployed students on waiting lists even if they have not responded to opting into the waiting list so that once they are back, they can maintain their spot and start the program as soon as possible.

Reciprocity Agreements

If the reciprocity agreement is legally binding (approved by HEAB or Joint Finance), the college would defer to the resident status established for students by the terms of the reciprocity agreement. However, it is crucial to check the specific wording of the agreement to ensure there are no clauses that might affect this status.

Many reciprocity agreements include language stating that reciprocity students cannot displace resident students, especially in limited-capacity programs. Additionally, some agreements explicitly exclude limited-capacity programs from their terms. Therefore, it is essential to review the language of each agreement carefully to understand its implications fully.

If the student does not meet the eligibility criteria under the reciprocity agreement, then the student would be treated as out-of-state for admission purposes.

For WI-MN reciprocity, MN reciprocity students have state residency status for tuition and *non-district state resident status for program admission priorities*. As institutions work to implement the residency provisions outlined in Wisconsin Administrative Code TCS 10, questions have arisen regarding the treatment of students seeking enrollment under *Minnesota Reciprocity while residency verification is still pending*.

Recommended practice: When a student's Minnesota residency has not yet been fully verified at the time of registration or waitlist decisions, colleges should make placement decisions in a manner that minimizes potential harm to the student. In practice, this means treating the student as eligible for reciprocity purposes until verification is completed.

Multiple Start Terms

Please see this explainer video for the nuances of waiting lists for programs with multiple start terms and overlapping application windows. Key things to remember:

- Students are joining the waiting list as they apply/complete their application for the program
- TCS10.07(5)(c): individuals who are on the waiting list maintain their spot and will have priority over all other applicants for subsequent terms (as long as they are not out-of-state residents)
- Students who have an earlier application date (or completed application date) who apply to a later term, should still be higher in the waiting list priority and offered a spot in core occupational/technical courses first. They can defer the spot in the core courses for their preferred start term. Due to this, if the program has academic preparedness criteria, the college should assess these criteria for all students on the waiting list rather than just the students who applied for the specific term that is up for enrollment.

Student Recruitment

If your college recruits out-of-state students, then you can confirm with the student that they can be admitted to the college. But if they are enrolling in a limited-capacity program, you cannot guarantee them a program spot until the end of the application window for the given term. This way you can ensure that a spot does indeed exist after all in-state student applicants (district and non-district state residents) are admitted to the available program spots for core courses.

IMPLEMENTATION TIMELINE

Compliance Timeline

Guidance will be in effect as of July 1, 2024. Updated college policies must go into effect by June 30, 2025, to ensure compliance for January 1, 2026 student enrollments. If the published application period for a program that starts on or after January 1, 2026, happens prior to July 1, 2025, then the college's previous enrollment policy may still apply.

Policy Alignment and Audits

The system office will conduct an annual audit, per TCS10.07. Non-compliant colleges will receive a state aid penalty. Colleges will receive guidance to facilitate local self-assessments prior to the first system office audit of TSC10.07.

State Aid Penalties

Colleges that have not implemented a compliant policy for students entering the January 2026 cohort will receive a state aid penalty. Policies will be audited starting in June 2025.

SPECIFIC PROGRAM GUIDELINES

High School Academies

High School Academies may or may not fall within your college's TCS10.07 waiting list policy. This will depend on whether the academy is taught via contract training (s. 38.14(3)) or Start College Now, both of which would not be subject to TCS10.07. However, if your college is holding spots in a limited capacity program for high school academy students, then this would need to be in a Special Circumstances Policy that is submitted to the System Office for Board review and approval.

Apprenticeship Programs

Apprentice enrollment that is through an employer s. 38.14(3) contract is exempt from TCS10. Apprentice enrollment that is not via an employer s. 38.14(3) contract is not exempt and must have a TCS10-compliant waiting list if capacity becomes limited. While we understand that Apprentices have a contract with their employer sponsor, this is different from an s. 38.14(3) contract which is between the college and the employer to provide training.

If a capacity issue arises in an apprenticeship program that is not through an s. 38.14(3) contract, then the college must initiate a TCS10.07-compliant waiting list. Since apprentices do not typically apply to the college, you can use a different process to timestamp their waiting list order, such as the date of their BAS contract with their employer sponsor.

If the apprenticeship is holding spots in a degree program, then this must be submitted as a special circumstances policy.

Programs Overseen by Department of Justice

Department of Justice has Program Enrollment Applications for applicable programs (e.g., Jail Officer, Law Enforcement Academy) and the college may choose to have this program application be used for the timestamp for the waiting list order, rather than also having students apply to the college. This is allowable, as long as this is transparent on the college's website (see example from SWTC) and the waiting list is time-stamped for when

this application is submitted, but not deemed complete, since some of the items in the application (e.g. interview) should be viewed as academic preparedness criteria. See the appendix for further information on Programs Overseen by Department of Justice.

Students on Multiple College Waiting lists

This should not impact your waiting lists. Treat these students the same.

Students Switching Programs

Local college policy can determine how to handle situations in which a student on a waiting list for one program switches to another program that also has a waiting list.

Flexibility in Enrollment Management for Low Demand Programs

For programs that are not in high demand, colleges should defer to their internal policies.

High Application, Low Enrollment Programs

Students unable to enroll in the term based on capacity would then be added to a TCS10.07-compliant waiting list.

- Programs are identified as high application, low enrollment if trends from previous years show that the students enrolling in program classes do not exceed capacity.
- Admit all students as 'Admitted: Core Ready' and monitor enrollment each term.
- If a term reaches enrollment capacity, then any admitted students not enrolled will be placed on a TCS10.07 compliant waiting list for prioritization for future terms.

Prioritizing Waiting list by Application Date

Your college will use the date the student submitted their program application or the date the submitted application is deemed complete to prioritize the waiting list. The date of matriculation is not an acceptable date for the waiting list priority given the requirements of TCS10.07. The application should include items required to gain access to your institution (e.g., transcripts, multiple measures criteria), but not program-specific criteria.

Programs Exempt from Waiting list Process

No WTCS-approved programs are exempt from the waiting list process if they reach capacity limits. One potential caveat though is one-course programs that are offered frequently, such as Certified Nursing Assistant (CNA), which could follow course enrollment policies **assuming that there are enough sections of CNA to allow applicants to enroll in a timely fashion** (e.g., within the next enrollment cycle). However, if there are capacity limitations to the CNA program, then a waiting list must be used.

Local college certificates that are not approved by the System Office are exempt from the TCS10.07 waiting list requirements.

Residency Verification Forms

Follow your current process for requesting residency verification forms.

Programs with Available General Studies but Full Core Courses

If students cannot access core program-level courses (e.g., occupational or technical courses), initiate the waiting list process.

TRANSPARENCY & REPORTING

Advertising Waiting list Time vs. Number

Colleges have flexibility in advertising waiting list time on the program public webpage as long as this information is transparent and not misleading. For example, colleges may also indicate the average time to enroll for students who meet academic preparedness criteria.

Providing Projected Academic Start Term (Core Courses)

As part of providing transparent information to students on a waiting list, colleges can inform students of their estimated academic start term for core courses in addition to their waiting list spot/number.

Notifying Students of Disqualification Criteria

Students must be informed of the specific criteria that disqualifies them from admission.

Client Reporting

Similar to how colleges currently report students to Client Reporting, students on the waiting list for core program courses must be reported as program enrolled via an S9 record.

ADDITIONAL CLARIFICATIONS

Deferring a Spot in a Program

Students may remain on the waiting list each term until admission is achieved, per TCS10.07(5)(d). There is no time limit for how long a student may defer their program enrollment. A college cannot deactivate students who continue to opt into the waiting list.

Unregistered Students: Students who receive a seat but do not register for courses.

Follow local policy for course registration if a student receives a seat but does not register.

Managing Residency, Application Dates, and Academic Preparation

Use the date of application submission (or date of application completion) to determine waiting list order. Cross-reference with residency status for prioritization. If a student's residency status changes, residency status can be based on the original program application, but the college has local control in how this is managed. See the 'Academic Preparedness' section in the 'Wisconsin Technical College System Waiting list Guidance for Limited Enrollment Programs'.

See an example: In this simple example, a program starts in Fall 2026 and only accepts 3 students. The program application opens on 9/15/2025 and closes 8/31/2026. The students are ordered by their application date and then the priority order column shows the order in which they would be admitted to the program (e.g., their waiting list spot). The application dates in bold indicate that in-district has preference.

Student ID	**Application Date**	**Residency Status**	**Priority Order**	**Program Status**
A	**9/15/2025**	in-district	1	In Fall 2026 Cohort
B	**9/15/2025**	non-district state	4	On waiting list
C	**9/16/2025**	in-district	2	In Fall 2026 Cohort
D	**9/16/2025**	non-district state	5	On waiting list
E	**10/1/2025**	in-district	3	In Fall 2026 Cohort
F	1/5/2026	in-district	6	On waiting list
G	1/6/2026	non-district state	7	On waiting list
H	2/1/2026	non-district state	8	On waiting list
I	2/5/2026	in-district	9	On waiting list

View the video on Understanding residency priority in relation to TCS 10.07(2)(a).

Multiple Start Terms and Priority Access

Follow the waiting list order based on the application date or when the application was deemed complete.

Embedded Programs and Waiting Lists

Waiting lists should be managed based on the specific program the student applied to in their program application.

Out-of-State Residents

Admit out-of-state residents only after all in-state residents (district and non-district state residents) on the waiting list have been admitted. Non-resident enrollment is subject to district board approval per s. 38.22(1)(d).

TRANSITION GUIDANCE

Transitioning Programs with Existing Students

For any student who has not been admitted to the program (e.g., pre-petition student) or is not on a current waiting list, the college is required to add these students to the waiting list based on the student's program application date (or when the application is deemed complete). If a student is on a waiting list (e.g., post-petition student) then they maintain their spot on the waiting list.

Effective Enrollment Term

This guidance is applicable to any student applying to the Spring 2026 semester and all successive terms. If the published application period for a program that starts on or after January 1, 2026, happens prior to July 1, 2025, then the college's previous enrollment policy may still apply.

APPENDIX: Protective Services TCS 10 Guidance

Background

To ensure compliance with Wisconsin Statute Chapter 38 and Wisconsin Administrative Code TCS 10, each college must establish and maintain an enrollment policy that describes the processes and procedures by which students enroll in the college and into specific programs, including maintaining waiting lists (TCS 10.07(5)). All programs must comply with all applicable WTCS policies and procedures. This includes Protective Services programs, such as Law Enforcement Academies (LE Academies), Fire Service programs and Emergency Medical Services programs, which are offered at WTCS colleges.

TCS 10.07 does not apply to singular courses such as Fire Certification courses.

Guidance

Current admission practices for Protective Services programs are varied across the System. The purpose of this guidance is to ensure that all WTCS Protective Services programs are compliant with TCS 10.07 while still meeting requirements of industry needs in each district.

Colleges must follow TCS 10 guidance as written for all programs and may establish one of three mechanisms for meeting Protective Services prioritization requirements such as prioritizing employer sponsored students or recruits: 1) Prerequisite Sections, 2) Employer Contracts or 3) a Special Circumstance policy. Additional information for each of these options is found below. Colleges must maintain a waiting list in accordance with WTCS guidance if there are capacity limitations in any Public Services programs. If feasible, colleges may also increase the number of spots available for a program to eliminate the capacity limitation.

Option 1 – Prerequisite Sections

Colleges are allowed to establish prerequisites for programs and courses as needed. Colleges may establish an employee-sponsorship prerequisite for some sections of Public Services program while leaving at least one section without that prerequisite for non-sponsored students. The prerequisite can be employment and/or sponsorship. Prerequisite sections cannot be limited to a specific employer, department or agency. Any course limited to a specific employer, department or agency can only be run via a 38.14 contract.

Admission to program sections is still subject to TCS 10.07 requirements and must follow outlined admissions requirements. If there are program capacity limitations, students shall be placed on a waiting list until they have met the prerequisite requirements or there is a spot available in the non-prerequisite program section.

Sections may be stacked in a single classroom or cohort. For example, a college may offer one cohort for 30 students with two sections. Section A = 25 students with a prerequisite that the student must be employed and sponsored by a department. Section B = 5 students with no employment pre-requisite. There is no size minimum requirement for program sections.

Option 2 – Contract Training

Colleges have the option to establish 38.14 employer contracts for sponsored students or recruits to meet the specific needs of specific employers. These contracts are exempt from TCS 10.07 requirements, allowing for more flexibility in admission processes. Using contract training for Protective Services programs will allow colleges to reserve seats for specific employers, departments or agencies, as they will contract directly with that entity (can be multiple entities in one contract) for the training. Pricing policies for contract training are established locally but must remain compliant with WTCS financial guidelines and policies, including pricing their contracts to be at least equivalent to tuition and material fees. In the case of Protective Services, external factors such as training reimbursement rates must also be considered when determining the cost for training contracts. If a course or section is created solely in response to a specific request by a service recipient and is not open to the general public, a 38.14 contract is required.

- In the case of Law Enforcement Academies, The Law Enforcement Standards Board sets the allowable training costs. A contract for services could be established with a department or multiple departments equivalent to these costs.
- In the case of Fire Service programs, courses eligible for Fire Service 2% Reimbursement may be offered under contract with no cost to departments or students. Reimbursement payments from WTCS to college districts would be reported as "other revenue" for those contracts.
- In the case of Emergency Medical Services, a contract for services could be established with a department or multiple departments equivalent to tuition and material fees paid by students.

Option 3 – Use of Special Circumstances Policy

Colleges may choose to establish a special circumstances policy to hold a reasonable number of spots for employer-sponsored students in a program. The number of spots that colleges may reserve for this type of special circumstance is limited to 49% of program spots or less. Special circumstances may not conflict with state statutes or administrative code. For example, a special circumstance policy may not redefine the state residency requirements as defined under TCS 10.07(2) to (5).