



WorkSource System Policy
WorkSource Standards & Integration Division

Washington envisions a nationally recognized fully integrated One-Stop system with enhanced customer access to program services, improved long-term employment outcomes for job seekers and consistent, high quality services to business customers. In order to achieve this vision, the WorkSource Standards & Integration Division sets a common direction and standards for Washington's WorkSource system through the development of WorkSource system policies, information memoranda, and technical assistance.

Policy Number: 3690, Revision 1
To: Washington WorkSource System
Date of Publication: September 23, 2011
Subject: Certificates and Credentials Under Common Measures

1. Purpose:

This policy addresses the counting of certificates and credentials toward Workforce Investment Act (WIA) federal common measures and state core measures (WIA Title I-B adult, dislocated workers, and youth activities formula grants).

2. Background:

The U.S. Department of Labor's (DOL) Training and Employment Guidance Letter (TEGL) No. 17-05 provides a national directive on the common measures for the WIA Section 136 performance accountability system. Under TEGL 17-05, one of the three common measures that apply to WIA Title I-B programs serving youth is "Attainment of a Degree or Certificate".

Attachment B of TEGL No. 17-05 details the U.S. DOL's common measure definition for "certificate", as defined in the "Attainment of a Degree or Certificate" youth measure, and indicates how this differs from the definition of "Credential" in use for WIA Title I-B performance measures.

Attachment D of TEGL No. 17-05, as explained by DOL Q&A clarifications, indicates that the new definition of certificate is applicable to WIA 1-B employment and credential rates for adults, dislocated workers, and older youth who began receiving WIA-funded services on or after July 1, 2006. The credential definition applies to adults and older youth who started receiving WIA services before July 1, 2006. Receiving services means receiving any countable service, not just training services.

The U.S. DOL's common measures do not include certificate rates for adults or dislocated workers. Until WIA is re-authorized and rules implementing any changes in WIA law become effective, TEGL 17-05 instructions will apply to performance measures for WIA adults, dislocated workers, and older

youth.

The definition of certificate used in common measures excludes some types of credentials that previously counted toward WIA 1-B employment and credential rates and some types of credentials that Washington State believes to be valuable to both employers and job seekers. At the same time, the tightened definition sets a high, national standard for certificates intended to insure that certificates counted toward WIA 1-B performance measure the attainment of measurable technical or occupational skills and that performance will be tracked consistently across the states.

The new federal definition also sets standards for the types of institutions and training organizations which may award certificates that count toward WIA 1-B performance measures. These include:

- Certificates granted by institutions of higher education eligible to participate in federally funded student financial aid programs.
- Certificates granted by a professional, industry or employer organization, product manufacturer or developer using a valid and reliable assessment of an individual's knowledge, skills, and abilities.
- Certificates granted by a registered apprenticeship program.
- Certificates granted by a public regulatory agency upon completion of an individual's fulfillment of educational, work experience, or skill requirements that are legally necessary to use an occupational title or practice an occupation or profession. Examples of public certification and licensing agencies include the Department of Health, Nursing Commission, Massage Board, and Washington State Patrol.
- Certificates granted by a program approved by the Department of Veteran's Affairs to offer education benefits to veterans and other eligible persons.
- Certificates granted by Job Corp centers.
- Certificates granted by institutions of higher education controlled, sanctioned, or chartered by the governing body of an Indian tribe or tribes.

The federal list also includes certificates granted by state educational agencies or other state agencies responsible for administering vocational and technical education within a state. The educational agencies within Washington State responsible for administering vocational and technical education (e.g.: State Board for Community & Technical Colleges, Office of the Superintendent of Public Instruction) do not grant certificates recognizing attainment of technical or occupational skills. Such certificates, if granted by the state educational agencies of other states, would be reportable.

Federal data element validation rules and procedures require that the type of certificate reported in the Workforce Investment Act Standardized Record Data (WIASRD) files (individual participant records) and counted toward federal performance measures must be validated by reviewing federally acceptable source documentation. Source documentation may be contained in a participant's case file or may be obtained by data cross-match with education agencies. Acceptable federal source documentation maintained in a case file can vary from program year to program year, although transcripts and actual copies of certificates or diplomas have been part of the list of acceptable sources for the past several years.

"High Skills, High Wages", Washington State's strategic plan for workforce development, describes

the state core measures of performance that are used to measure WIA 1-B performance in addition to the federal common measures of performance. The state core measures include skills measures for WIA 1-B adults, dislocated workers, and youth defined as: “the percentage of participants who obtained an appropriate credential.” Washington state core measures of performance will continue to contain skill measures for adults, dislocated workers, and youth, regardless of changes in federal law.

Prior to changes required by federal common measures policy, Washington State made no distinction between the definition of credentials countable toward federal WIA performance measures and countable toward state core measures.

Given the changes at the federal level, application of the federal common measures certificate definitions will no longer allow Washington State to count four types of credentials toward WIA 1-B adult, dislocated worker, and youth performance (for services started on or after July 1, 2006). These four types of credentials are:

- Credentials granted by Workforce Development Council (WDC) policy for the successful completion of on-the-job training program in the absence of an industry based skill certificate based on a valid and reliable assessment of an individual’s knowledge, skills, and abilities.
- Credentials granted by training programs approved for inclusion on Washington State’s Eligible Training Provider List (ETPL) for programs included on that list that do not meet one of the federal requirements for certificate granting organizations (eligibility to participate in federally funded student financial aid programs, approval by the Department of Veterans Affairs, or registration as an apprenticeship program).
- Work readiness credentials, based on national standards and valid assessments, certifying that a worker has the knowledge, skills and abilities needed to succeed at entry-level employment.
- Other types of credentials reported and/or approved by WDCs including: food handler’s cards, first aid cards, certificates of completion of work readiness programs or short term training programs, completion of work experience programs not accompanied by a training component, and attainment of employment following the start of a training program.

The intent of this policy is to clarify that Washington State will follow federal common measure certificate rules for counting and reporting certificates reported to the U.S. DOL in WIASRD files and toward meeting federal performance measures. The policy also identifies additional credentials which Washington State will count toward state core measures. Some credentials will no longer be counted toward federal WIA 1-B measures or state core measures.

Examples of these non-countable credentials will be provided, along with a set of criteria to be used in determining whether newly created certificates or credentials will be countable toward federal common measures and/or state core measures.

3. Policy:

Given the similarity between the terms “certificate” and “credential” in the following policy, they are defined as:

Certificate: refers to diplomas, certificates, and awards that meet the DOL's definition of certificates provided by institutions and training organizations authorized to issue such certificates as described in common measures policies outlined in TEGL 17-05.

Credential: refers to all other diplomas, certificates, awards, and documentation of skills attained that meet the state of Washington's core measure definition of countable credentials but do not meet the DOL's common measures definitions.

a. Certificates Counted Toward Federal Performance Measures

Certificates reportable to the U.S. DOL under the common measures policy contained in TEGL 17-05 will be recorded in the Skills, Knowledge, and Information Exchange System (SKIES) and in case files used for validation of federal reports. This change in policy applies to all WIA adult, dislocated worker, and older youth job seekers whose services began on or after July 1, 2006.

Certificates must be recorded in the categories reportable to the U.S. DOL which currently include:

- High School Diploma
- GED
- AA or AS Diploma/Degree
- BA or BS Diploma/Degree
- Occupational Skills License
- Occupational Skills Certificate
- Other Recognized Diploma, Degree or Certificate

Under common measure rules, the only types of other recognized diplomas, degrees, or certificates which should be reportable are Master's Degrees, Doctorate Degrees, and Apprenticeship completions. All other countable certificates should be reported as the appropriate type of diploma or degree or as an occupational skills license or occupational skills certificate.

Occupational skills licenses are granted by state licensing or regulatory bodies and are required as a condition of practicing an occupation. These include cosmetology licenses, massage licenses, commercial driver's licenses, nursing licenses, and other such licenses.

For a list of occupations licensed by the Department of Licensing in Washington state see: <http://www.dol.wa.gov/business/professionals.html>. For a list of occupations licensed by the Department of Health in Washington state see: <http://www.doh.wa.gov/licensing/>.

Occupational skills certificates provided by technical or community colleges, private career schools, and other training organizations may be counted as occupational skills certificates if the provider meets the federal definition of an institution or training provider that may issue certificates recognized under the federal common measures definitions as defined above. These definitions include eligibility of the institution to participate in federal financial aid and approval of a program by the Department of Veterans Affairs.

Programs of study shorter than 600 hours are not eligible for federal financial aid. However, programs of study shorter than 600 hours produce countable occupational skills certificates as long as the school offering the program is an institution of higher education eligible to participate in federally funded student financial aid programs.

Department of Veterans Affairs approval of a program of study does not depend on program length, so programs of study shorter than 600 hours can qualify to produce countable certificates under that part of the definition.

It should be possible to determine whether one of these criteria is met by reviewing the Eligible Training Provider List (ETPL), which will supply information on programs of study and their providers.

Other sources of acceptable occupational skills certificates are:

- Clearinghouses of industry skill certificates being developed for use in skill assessments in vocational education, such as Vocational Technical Education Consortium of States (VTECS).
- State or regional employer skill panels that have developed skill standards, methods of testing to determine that job seekers meet those standards, and issue certificates to those meeting standards.
- Occupational Safety and Health Administration (OSHA) or Washington Industrial Safety and Health Act (WISHA) testing of operator skills for the operation of equipment.
- Certificates of training completion required by OSHA or WISHA to flaggers, fork lift operators, or other workers as a condition of performing work in an occupation.

The date on which certificates or licenses were awarded should be recorded in SKIES. Dates are needed to determine whether the certificate was awarded within the proper time frames to be counted toward performance results.

For adults, dislocated workers, or older youth whose services began on or before June 30, 2006, the old definition of credentials applies. The old definition of credentials allowed locally defined credentials to be counted, including On-the-Job-Training (OJT) completions and credentials granted by WDCs.

b. Credentials Countable Toward State Measures of Credential Attainment

In addition to the certificates countable toward federal performance, three types of credentials are countable toward state core measures of performance:

i. Successful Completion of a Work-Based Training Plan

Successful completion of an OJT plan approved by a WDC is countable as a credential toward state credential rates for adult and dislocated worker populations. Successful completion of a Work Experience Training plan approved by a WDC is countable as a credential toward state credential rates for youth populations.

Successful completion of an OJT plan means attainment of the skills which the OJT plan was

designed to teach, not merely employment following the end of the plan. Information necessary to document the successful completion of the plan should be maintained in case files, along with information documenting the starting and ending date of the plan. The credential date used will be the ending date of the plan.

If the OJT plan leads to skill testing that produces an occupational skills certificate meeting federal certificate definitions, there is no need to record both the occupational skills certificate and the OJT completion. In such a case, only the occupational skills certificate need to be recorded.

OJT is the recognized method for providing work-based training for adults and dislocated workers. According to federal WIA policy, OJT is seldom appropriate for youth. For youth, the recognized equivalent is work experience. A work experience program that includes the development and documented completion of a training plan should have a credential counted as successful completion of a work-based training plan under this policy.

Work experience for adults, and work experience for youth populations that does not have a significant training component whose results can be measured by a valid reliable assessment do not count toward state and/or? federal common measure certificate or state core measure credential rates.

ii. Work Readiness Credentials

Standardized, validated, work readiness credentials that measure non-technical work readiness skills that are needed by employers are countable toward state credential measures. A work readiness credential demonstrates the ability to apply situational judgment, reading, math, and communication skills in a work-related context.

The National Work Readiness Credential is one credential that meets this standard. Photocopies of work readiness credentials should be retained in case files to document attainment of this credential. The date of credential attainment should be recorded in case files and in SKIES.

iii. Credentials granted by eligible training providers licensed as private career schools by the state of Washington

A diploma, certificate or award from a program offered by a private career schools licensed by the state of Washington can be counted toward state credential rates if the diploma, certificate or award is countable as a federal occupational skills certificate. If the diploma, certificate or award from a private career school licensed by the state of Washington is not countable as a federal certificate, it counts as a state credential if the program is on the Washington State ETPL as long as the occupation trained for does not require a license to practice. If a license is required to practice an occupation or profession, such as cosmetology, real estate, nursing, or massage therapy, and the ETPL program is not countable as a federal occupational skills certificate, then completion of such a program does not count toward state core measures credential rates. For example, completion of an ETPL program in cosmetology by an institution or organization that is not eligible to issue a certificate under the federal common measures definition would not qualify as a state core measures credential because a student could not practice cosmetology without a

license. However, attainment of the cosmetology license is countable as a federal certificate (Occupational Skills License) and, therefore, as a state credential.

It should be possible to determine which of these criteria are met by reviewing the ETPL, which will supply information on the federal financial aid status, veteran's approval, and occupational licensing requirements for a program of study. If an occupational skills license or occupational skills certificate is countable toward federal performance measures because the occupation is licensed, the institution or training provider is eligible to participate in federal financial aid, or the program is approved by the Department of Veterans Affairs, the resulting certificate should be counted as a federal occupational skills license or occupational skills certificate, not as a credential provided by a private career school.

Presence of a program on the ETPL does not automatically mean that a program grants a credential or diploma countable toward state core measures credential rates. Some programs on the ETPL are not licensed by the Workforce Training and Education Coordinating Board, (Workforce Board), Department of Licensing or equivalent regulatory agency, not eligible for federal financial aid, and not approved by the Veteran's Administration. Credentials or diplomas provided by such programs do not count toward either federal common measures certificate or state core measures credential rates.

c. Credentials that Do Not Count Toward Federal Common Measures Certificate Rates or State Core Measures Credential Rates

Some credentials that have been approved by WDCs prior to this policy do not count toward federal common measures certificate or state core measures credential rates. To be counted toward state core measures credential rates, a diploma, or award should:

- Have significant vocational content.
- Result from valid, objective assessment
- Be portable from one employer or region of the state to another.
- Be meaningful to employers.

To be counted, certificates and credentials should be necessary and sufficient to performing a job, not just necessary. For example, some jobs require that the holder have a non-commercial driver's license or a first-aid card. However, such ancillary credentials do not normally indicate that one is qualified to perform the job.

Credentials that do not count toward federal common measure certificate or state core measure credential rates include but are not limited to:

- First Aid Cards
- Food Handler's Cards
- Non-Commercial Driver's Licenses
- Proof of employment held subsequent to training.
- Certificates of completion for short-term intensive services

- Completion of Younger Youth Skill Goals
- Attainment of Youth Numeracy and Literacy Gains
- Completion of work experience programs for adults or dislocated workers.
- Completion of work experience programs for youth that do not contain a skill training component and assessment of results.
- Completion of programs provided by institutions and training organizations not licensed by the Workforce Board or equivalent state regulatory agency in cases where the institution or training provider is not eligible to provide federal common measures certificates as described above.

Please note that job seekers may be able to obtain countable occupational skills certificates after short-term intensive services. The occupational skills certificate, once obtained, is countable toward federal and state performance measures. Completion of the short-term intensive services, by itself, is not countable toward federal or state performance measures.

4. Standards:

N/A

5. Definitions:

Certificate - diplomas, certificates, and awards that meet the DOL's definition of certificates provided by institutions and training organizations authorized to issue such certificates as described in common measures policies outlined in TEGL 17-05.

Credential - all other diplomas, certificates, awards, and documentation of skills attained that meet the state of Washington's core measure definition of countable credentials but do not meet the DOL's common measures definitions.

6. References:

- WIA Section 136, Performance Accountability System
- U.S. DOL TEGL No. 17-05

7. Supersedes:

Policy 3690, Certificates and Credentials Under Common Measures, August 15, 2007

8. Website:

<http://www.wa.gov/esd/1stop/policies/title1b.htm>

9. Action:

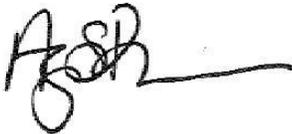
All WorkSource System programs and activities funded in whole or in part under Title I of the Workforce Investment Act are required to comply with this policy. Workforce Development Councils

and their contractors, as well as Employment Security Area Directors, should distribute this policy broadly throughout the system to ensure that WorkSource System staff are familiar with its content and requirements.

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Approved:

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