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Category: Employment and Training Programs
Subject#: Degree/Certificate Requirements for Youth Common Measures
Source: Federal/State
Revise/Replace: rescind 01-13-WIA1 and revise 07-12-WIA
Contact: Workforce Development Programs Director
Distribution: Managers, Workforce Development Staff, Workforce Region Directors
Colorado One-Stop System Policy Guidance Letter #: 08-16-WIA
Date: October 31, 2008

CHANGES ARE HIGHLIGHTED IN YELLOW

I. REFERENCE(S)

USDOL Training and Employment Guidance Letter (TEGL) No 17-05, Common Measures Policy for the Employment and Training Administration's (ETA) Performance Accountability System and Related Performance Issues; Workforce Investment Act of 1998; 20 CFR Part 652 et al. Workforce Investment Act: Final Rules

II. PURPOSE

To provide revised guidelines on the Youth Common Measures Attainment of a Degree or Certificate measure, as it relates to Federal definitions, documentation requirements, and reporting procedures for WIA Youth, and a December 31, 2008 deadline for the submission of the Workforce Regions local policy on what constitutes a Degree/Certificate for eligible WIA Youth participants.

III. BACKGROUND

USDOL released TEGL 17-05, Common Measures Policy for the Employment and Training Administration's (ETA) Performance Accountability System and Related Performance Issues, in February 2006. The intent of the TEGL was to replace the existing guidance with a single, unified USDOL document on the Common Measures and WIA Section 136 Performance Accountability System.

On June 29, 2007, USDOL approved Colorado's waiver to permit the State to replace the performance measures at WIA section 136(b) with the Common Measures. Under the waiver the State will no longer report on the WIA Adult and Dislocated Worker Credential Rates; Participant and Employer Customer Satisfaction; Older Youth measures; and Younger Youth measures. Instead, the State will report on the three Adult Common

Measures and the three Youth Common Measures beginning with Program Year 2007 (July 1, 2007 through June 30, 2009).

In TEGL 17-05 the Youth Attainment of a Degree or Certificate measure is defined as follows:

“Of those enrolled in education (at the date of participation or at any point during the program):

The number of youth participants who attain a diploma, GED or certificate by the end of the third quarter after the exit quarter divided by the number of youth participants who exit during the quarter”.

NOTE: The Youth Attainment of a Degree or Certificate measure applies to all WIA youth, whether enrolled in the Younger or Older Youth programs, who participate in educational or training activities (as defined by this PGL) at any time during enrollment, and were exited during the performance-reporting time frame that has been defined for this measure. In addition, individuals in secondary school at exit will be included in this measure.

This is consistent with ETA’s vision to ensure youth successfully complete their secondary education, which will ultimately lead to better long-term success in the workforce. Diploma, GEDs or certificates can be obtained while a person is still receiving services or at any point by the end of the third quarter after the exit quarter.

TEGL 17-05 also provides the following definitions that relate to the Degree/Certificate measure:

- 1. Advanced Training/Occupational Skills Training** applies to youth and means an organized program of study that provides specific vocational skills that lead to proficiency in performing actual tasks and technical functions required by certain occupational fields at entry, intermediate or advanced levels. Such training should be outcome oriented and focused on a long-term goal as specified in the Individual Service Strategy (ISS) and result in attainment of a certificate.
- 2. Certificate** means a document that is awarded in recognition of an individual’s attainment of measurable technical or occupational skills necessary to gain employment or advance within an occupation. These technical or occupational skills are based on standards developed or endorsed by employers. **Certificates awarded by local Workforce Investment Boards and work readiness certificates are not included in this definition.** Certificates must be awarded by:
 - A state educational agency or a state agency responsible for administering vocational and technical education within the state;
 - An institution of higher education described in Section 102 of the Higher Education Act (20 USC 1002) that is qualified to participate in the student finance assistance programs authorized by Title IV of that Act. This includes community colleges, proprietary schools, and all other institutions of higher education that are eligible to participate in federal student financial aid programs;
 - A professional, industry or employer organization (e.g., National Institute for Automotive Service Excellence certification, National Institute for Metalworking

Skills, Inc., Machining Level I credential) or a product manufacturer or developer (e.g., Microsoft Certified Database Administrator, Certified Novel Engineer, Sun Certified Java Programmer) using a valid and reliable assessment of an individual's knowledge, skills, and abilities;

- A registered apprenticeship program;
- A public regulatory agency, upon an individual's fulfillment of educational, work experience or skill requirements that are legally necessary for an individual to use an occupational or professional title or to practice an occupation or profession (e.g., FAA aviation mechanic certification, state certified asbestos inspector);
- A program that has been approved by the Department of Veterans Affairs to offer education benefits to veterans and other eligible persons;
- Job Corps centers that issue certificates; and
- Institutions of higher education which is formally controlled or has been formally sanctioned or chartered by the governing body of an Indian tribe or tribes.

3. Diploma means any credential that the state education agency accepts as equivalent to a high school diploma. This term also includes post-secondary degrees such as Associate (AA and AS) and Bachelor (BA and BS) degrees.

NOTE: In Colorado, local school boards have the authority to set graduation requirements, grading policies and conditions for awarding high school diplomas as long as those policies do not violate civil rights of students. Diplomas for students that receive special education services will be determined by the region's local school board.

4. Education means participation in secondary school, post-secondary school, adult education programs or any other organized program of study leading to a degree or certificate.

5. Employer Endorsed means that employers within a particular industry or cluster of industries recognize the certificate and would not impose an employment barrier, because the program was completed in another state or other regional location.

6. Post-secondary Education means a program at an accredited degree-granting institution that leads to an academic degree (i.e., AA, AS, BA or BS). Programs offered by degree-granting institutions that do not lead to an academic degree (e.g., certificate programs) do not count as placement in post-secondary education, but may be counted as placement in "advanced training/occupational skills training.

7. Training Services means any WIA-funded and non-WIA funded partner training services. Services include: occupational skills training including training for non-traditional employment; on-the-job training; programs that combine workplace training with related instruction, which may include cooperative education programs; training program operated by the private sector; skill upgrading and retraining; entrepreneurial training; job readiness training; adult education and literacy activities in combination with other training; customized training conducted with a commitment by an employer or group of employers to employ an individual upon successful completion of the training.

IV. POLICY/ACTION

Each local workforce board is required to develop a policy addressing the Degree/Certificate process, including identifying the official document that serves as evidence of the process. The deadline for submission of the local policy for the Degree/Certificate Requirements for Youth Common Measures is December 31, 2008. At a minimum, the following elements must comprise the local policy:

A. Basic Requirements

All education and training services covered by this policy must be clearly identified, and expectations for earning a degree or certificate must be stated in the Youth's Individual Service Strategy (ISS). Such services should provide preparation for post secondary educational opportunities, linkages between academic and occupational learning, preparation for employment, and effective connections to intermediary organizations that provide strong links to the job market and employers.

The youth must understand that once a training or education service begins, he or she is expected to complete all coursework and other activities required for attainment of the diploma or certificate. (For example, to achieve an LPN certificate requires completion of multiple classes and clinical experience.) Partial program completion does not meet the intent of federal requirements, and case managers must not report degrees or certificates if the youth failed to complete the entire training program as stipulated in the ISS.

B. Criteria to Define Certificate-or-Degree-Eligible Education/Training

Based on USDOL policy regarding degrees and certificates, and the definitions cited above, the following criteria are to be used to define training/education services and "other organized programs of study." All of these criteria must be met for the training/education program to be deemed degree or certificate eligible:

1. A program is typically more than one course. Stand-alone courses, in general, do not meet the measures' intent. There may be exceptions which must be reviewed by the Workforce Development Programs staff on a case-by-case basis.
2. The training/education must have a clear structure and standardized mechanism of delivery.
3. The program fulfills a specific set of occupational requirements with clear and measurable goals and objectives.
4. The certificate and knowledge/skills are transferable from one employer to another within the industry(s) that recognizes the certificate.
5. The degree/certificate must be issued by one of the organizations listed in the certificate definition. There are no exceptions.
6. The participant cannot obtain employment in a particular occupation without successfully completing the program. If applicable, the participant cannot secure a license to practice the skills required through the program, and the license is required to secure employment.
7. Successful program completion is determined by a validated and reliable set of evaluation instruments that are legally defensible in a court of law. Those same

measures of reliability and validity can be applied to determine when performance is unacceptable or dangerous to the individual, the coworkers or the customers served.

NOTE: If the local region or case manager cannot determine if a program of instruction qualifies for a degree or certificate based on the criteria listed above, the region may request a determination from the Workforce Development Programs staff. The request should be submitted to the region's assigned Workforce System Specialist.

V. DOCUMENTATION

Administrative records will be utilized to document the education and training data elements related to the attainment of a degree or certificate performance measure. Self-attestation will not be accepted. All data and documents used to determine achievement of a degree or certificate will be subject to audit, as well as the data validation review process required by USDOL to determine data accuracy.

A. Allowable Data Sources

The following data sources can be used to determine whether participants in youth programs attain degrees or certificates:

- Surveys/contact (with one or more of the organizations listed below) that are documented in case notes
- Record sharing agreements and/or automated record matching with administrative/other data sources. These data sources may include
 - State boards of education
 - State boards governing community colleges
 - State boards governing universities
 - State licensing boards for private schools
 - State education associations
 - Integrated post-secondary or higher education reporting units
 - State Department of Professional or Occupational Regulation
 - Professional, industry, or employer organizations or product manufacturers or developers
 - Training institutions/providers
 - Adult Basic Education providers (GED equivalent testing agencies)

B. Documenting Type of Recognized Credential

The following documents can be used to determine the type of recognized education or occupational certificate/diploma/degree attained by the youth who received education or training services:

- Transcripts
- Certificates
- Diploma
- Case Notes documenting surveys/contact with one of the data source agencies listed above

C. Documenting Completion of Diploma, GED or Certificate

The following documents can be used to demonstrate completion of a diploma, GED or Certificate - copies of:

- Transcripts
- Certificates

- Diplomas
- Letters from school system

D. Documenting Date of Attained Degree or Certificate

The attainment date of a diploma, GED or certificate is the date shown on the following documents:

- Transcripts
- Certificates
- Diploma
- Letter from school system
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NOTE: Refer to Attachment A (B.2.) - JobLink Reporting when recording this in JobLink

E. Documenting Enrolled in Education (at the date of participation or at any point during the program)

The following data sources can be used to determine whether participants in youth programs were enrolled in education at the date of participation or at any point during the program:

- Applicable records from education institution, certifying enrollments
- Case notes with verification from education institution or training provider that they are enrolled in education.

VI. JOBLINK REPORTING

In order to ensure that youth are counted in the Common Measures Attainment of Degree or Certificate measure, the data entry detailed in Attachment A – JobLink Reporting needs to occur within JobLink.

VII. IMPLEMENTATION DATE

Immediately upon receipt of the Program Guidance Letter.

VIII. INQUIRIES

Please direct all inquiries to your Workforce System Specialist at Workforce Development Programs.

Thomas J. Looft, Director
Workforce Development Programs

**JOBLINK REPORTING
FOR ATTAINMENT OF DEGREE OR CERTIFICATE
11/16/2007**

NOTE: This is the most current information available on JobLink procedures, but these procedures may be subject to change. Please consult with your local MIS Coordinator, as needed.

A. Inclusion in the denominator of the measure is based upon data entered into the following JobLink fields:

1. Enrolled in Education Anytime

This field is located on the first “Store Term Information” screen and is used to indicate that a youth participant was enrolled in secondary school, post-secondary school, adult education programs or any other organized program of study during his or her WIA registration. A “Y” in this field will result in inclusion in the denominator of the measure.

2. Educational Status

This field is located on the screen titled “Store Program Information Page 2” and is used to indicate a youth applicant’s school status at intake. An “S” an “A” or a “P” in this field, will place the participant in the denominator of the measure.

3. F8 – Display Services

JobLink will also search the participant’s service history for activity codes associated with organized programs of study. The following activity codes entered into a record will also result in inclusion in the denominator of the measure: CT (Certificate Training), OC (Occupational Skills Training), BS (Basic Skills), and/or AS (Alternative Secondary School).

B. Inclusion in the numerator of the measure is based upon data entered in the following JobLink fields:

1. Education Attain Type

This field is located on the second “Store Term Information” screen and is used to indicate the type of certificate earned either during the registration or up to three quarters after. The values CT, HS, GE, AA, BA, or OL in this field will result in inclusion in the numerator of the measure. (For the purposes of WIA Data Validation, the CT value in the Education Attainment Type field should only be reported if the participant earned a countable occupational skills certificate that is *not* a high school diploma, GED, Associate’s Degree, Bachelor’s Degree, or Occupational Skills License.)

2. Date Education Attained

This field on the “Store Term Information” screen is where credit is taken for the actual attainment date of the degree/certificate received by the participant. Enter the date that is located on the required source documentation. Acceptable documentation includes transcript, certificate, diploma, or letter from the school

system. The Date Education Attained must fall during the date range of registration or within three quarters after the exit date.

C. Use of the CT Service instead of OC for Youth Only:

JobLink was recently modified to include a new training service exclusively for youth that are to be counted in the Common Measures Attainment of Degree or Certificate measure. The new CT service is defined as follows:

CT (Certificate Training) A certificate is awarded in recognition of an individual's attainment of measurable technical or occupational skills necessary to gain employment or advance within an occupation. These technical or occupational skills are based on standards developed or endorsed by employers. Certificates awarded by workforce investment boards are not included in this definition. Work readiness certificates are also not included in this definition.

NOTE: The completion code within the CT or OC service will not automatically populate the Education Attainment Type field on the Termination screen, under any circumstances. This field must be input manually with the appropriate code that corresponds with the education attainment type achieved.