



Category/Subject: Degree/Certificate Requirements for Youth Common Measures
Colorado Policy Guidance Letter#: WIOA/WIA-2008-01 (prior #08-16-WIA)
Revise/Replace PGL#: rescind 01-13-WIA1 and replace 07-12-WIA
Date: October 31, 2008
Distribution: CDLE Management/Finance, State/Local Workforce Directors & Staff, Partners

**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 nontraditional 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 postsecondary 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

**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:** Effective immediately.

**INQUIRIES:**

Please direct all inquiries to your Regional Liaison at Workforce Development Programs.

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