



Date: June 29, 2006

To: WDB Directors
Job Service Directors
Job Service Supervisors
ASSET User Group Representatives

From: Gary Denis
Acting Bureau Director
Bureau of Workforce Programs

Subject: **Revised WIA Policy Update 06-07: Certificate Requirements and Policy**

Purpose

This policy update revises the certificate reporting procedures for WIA Title 1 Adults, Dislocated Workers who receive training services and Youth who are enrolled in education on the date of first youth service or at any point during youth program participation. This policy rescinds and replaces WIA Policy Update 04-13: Certificate Requirements and Policy which was published on June 1, 2006.

Legislative/Regulatory/Policy References

- Training and Employment Guidance Letter (TEGL) 17-05: Common Measures Policy for the Employment and Training Administration's (ETA) Performance Accountability System and Related Performance Issues
- Workforce Investment Act 20 CFR s. 666
- WIA Policy Update 04-13: Certificate Requirements and Policy

Background

In a discussion with U.S. Department of Labor (U.S. DOL) representatives on June 21, 2006, WIA Section policy staff were informed that the "opt-in" procedure used in ASSET to determine who will be counted in certificate measures cannot be implemented. When training services are provided, the participant must be counted in the certificate measures, regardless of whether or not he/she completes the certificate attainment requirements.

Certificate/credential attainment reporting is required for three of the 17 existing WIA Title 1 negotiated performance measures for Adults, Dislocated Workers and Older

Youth. It is also required for the new *All-Youth Attainment of a Degree or Certificate* measure.

The *All-Youth Attainment of a Degree or Certificate* measure states:

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

The number of participants who attain a diploma, GED or certificate by the end of the third quarter after the exit quarter divided by the number of participants who exit during the quarter. Certificates awarded by workforce investment boards or awarded in recognition of only generic pre-employment or work readiness skills are not included in this definition."

The *Adult Employment and Credential Attainment* measure states:

"Of those adults who received training services:

Number of adult participants who were employed in the first quarter after exit and received a credential/certificate by the end of the third quarter after exit divided by the number of adult participants who exit during the quarter."

The *Dislocated Worker Employment and Credential Attainment* measure states:

"Of those dislocated workers who received training services:

Number of dislocated worker participants who were employed in the first quarter after exit and received a credential/certificate by the end of the third quarter after exit divided by the number of dislocated worker participants who exit during the quarter."

The *Older Youth Credential Attainment* measures states:

"Number of older youth participants who are either employed, in post-secondary education, or in advanced training/advanced training-occupational skills training in the first quarter after the exit quarter and received a credential/certificate by the end of the third quarter after the exit quarter divided by the number of older youth participants who exit during the quarter."

The following definitions apply to the above-referenced performance measures for all participants who begin receiving services on or after July 1, 2006.

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 Employability Plan (IEP) and result in attainment of a certificate as defined below.

Certificate/Credential 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 workforce investment boards and work readiness certificates are not included in this definition. Certificates must be awarded by:

- A state education agency, or a state agency responsible for administering vocational and technical education within a 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 financial 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) or a product manufacturer or developer (e.g., Microsoft Certified Database Administrator, 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., Federal Aviation Administration aviation mechanic certification, State-licensed Emergency Medical Technician);
- 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 that are formally controlled, or have been formally sanctioned or chartered by, the governing body of an Indian tribe or tribes;

Diploma means any certificate/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.

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.

Employer endorsement 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.

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).

Training Services means any WIA-funded and non-WIA funded training service. 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 programs operated by the private sector; skill upgrading and retraining; entrepreneurial training; job readiness training; adult education and literacy activities in combination with other training; and customized training conducted with a commitment by an employer or group of employers to employ an individual upon successful completion of the training.

Policy

Receipt of training is often only one component of the certificate/credential measures. In most instances, successful completion of training is coupled with other requirements to receive a certificate/credential. A course completion certificate alone is usually insufficient to demonstrate certificate/credential attainment. Examples of programs that meet the criteria outlined in this policy are included in the Appendix.

All training services covered by this policy must be clearly identified and expectations for the earning of the credential or certificate must be stated in the participant's Individual Service Strategy or employment plan. The participant must understand that once training begins, he or she is expected to complete all required activities. Partial program completion does not meet the intent of Federal requirements and case managers must not report certificates or credentials if the participant failed to complete the entire program.

Based on the U.S. DOL policy regarding credentials and certificates and the definitions cited above, the following criteria will be used to define training services and "other organized programs of study." All of these criteria must be met for the program to be deemed certificate or credential eligible for all performance measures that evaluate credential or certificate attainment.

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 Division of Workforce Solutions (DWS) policy staff on a case-by-case basis.
2. The training 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. The certificate holder has the required skills to be functional on the job on the first day of employment, with minimal supervision.

4. The certificate and knowledge/skills are transferable from one employer to another within the industry(s) that recognizes the certificate.
5. The certificate or credential 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 acquired 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.
8. There must be clear evidence from the program provider or certifying agency that a certificate is not awarded if the customer fails to successfully complete the program, demonstrate competency in all skills and objectives, and/or pass all required tests and examinations. This means all attendance requirements must be fulfilled, a minimum rating of "satisfactory" must be documented for all required practical skills, a passing score must be achieved on written tests or examinations, and any other requirements for certification must be met.

If a Workforce Development Board (WDB) or case manager cannot determine if a program of instruction meets the definition of a credential or certificate based on the criteria listed above, the WDB may request a determination from DWS policy staff. The request should be submitted to the WDB's assigned local program liaison.

Short term training courses that address only one skill set out of many do not meet the measures' intent. Organizations that rely on a train-the-trainer, trickle-down method of delivery may not be acceptable because of the lack of standardization, official oversight and questionable employer or industry endorsement. Programs of this type will be examined by DWS staff on a case-by-case basis before a determination of acceptability will be made using the criteria outlined in this policy.

ASSET Reporting

Effective July 1, 2006, no credential-eligible Intensive services will count toward certificate or credential attainment for any individual who becomes a new participant on or after July 1, 2006. The credential radio buttons will be inactivated or removed from applicable Intensive services in ASSET. All services on the ASSET Training Services menu, except Adult Education and Literacy, will place a participant (adult, dislocated worker and co-enrolled youth) in the certificate/credential performance measures. The following Youth program elements will place a youth into the youth certificate and credential measures:

- Alternative Secondary School Offerings,
- Apprenticeship, and
- Instruction Leading to Secondary School Completion.

There is no substantial change for the credential and certificate reporting process in ASSET.

Action Required

This policy is effective June 29, 2006. Questions about this policy should be directed to your Local Program Liaison.

cc: Dianne Reynolds, WIA Section
Local Program Liaisons
WIA Policy staff

APPENDIX

This appendix contains DWS review summaries of programs that issue certificates/credentials. A review is conducted when WDB staff are unable to determine whether or not a particular certificate program is reportable in the WIA Title 1 certificate and credential attainment measures for Adults, Dislocated Workers and Youth.

These summaries do not endorse individual training providers nor do they draw any conclusions about the quality of one training program over another. They are intended as a guide to assist local boards and case managers in determining when certificates/credentials are to be reported and counted in applicable WIA Title 1 performance measures. They are also designed to provide additional substance and breadth to the U.S. DOL's stated intentions regarding the acquisition and reporting of certificates/credentials.

Additional summaries will be added after requested reviews are completed, but will not necessitate a new review and comment period for WIA Policy Update 04-13.

1: Wisconsin Department of Public Instruction Skill Standards Certificate Programs

The following DPI-issued certificates meet the definition of a credential/certificate:

- Wisconsin Cooperative Education Skill Standards Certificate Program
- Wisconsin Employability Skills Standards Certificate Program
- Assistant Child Care Teachers Program (ACCT)
- Youth Leadership Skill Standards Certificate Program

For further information about these programs, go to

<http://www.dpi.state.wi.us/dpi/dlsis/let/cteskills.html>

For a comprehensive listing of Nationally Recognized, Industry-Based Skill Standards that can be reported as certificates/credentials, go to:

<http://dpi.wi.gov/cte/pdf/industryb.pdf>

2: Wisconsin Department of Regulation & Licensing

For a listing of credentials that meet this definition, you can visit this web site.

http://drl.wi.gov/drl/drllookup/LicenseLookupServlet?page=list_credentials

3: Day Care Training and Certification

Question: Do day care training programs and certification requirements meet the WIA Title 1 certificate definition and requirements?

Legislative references:

- DWD 55: Day Care Certification.
- HFS 46: Licensing Rules for Group Child Care Centers.
- Chapter 46.03, Stats.: Social Services.
- Chapter 48.65, Stats.: Children's Code.
- Training and Employment Guidance Letter (TEGL) 17-05: Common Measures Policy for the Employment and Training Administration's (ETA) Performance Accountability System and Related Performance Issues.
- Workforce Investment Act (WIA), 20 CFR s. 666.
- WIA Policy Update 04-13: Certificate and Credential Requirements and Policy.
- BHCE/BWP Operations Memo 03-49, Supplement to Operations Memo 03-34: Child Care Entry Level Courses - Curriculum Re-design and Effect on Day Care Certification.

Day care centers and providers must be certified to provide care to one or more children. They are regulated by the Department of Health and Family Services (DHFS) and the Department of Workforce Development (DWD). There is a body of statutes, administrative rules and policy documents that define the criteria for certification, training requirements and levels of licensure or certification. Workforce Development Board (WDB) staff have asked for clarification on how training programs that prepare WIA Title 1 participants to receive day care center certification fit into the U.S. Department of Labor (U.S. DOL) definition of programs of instruction and certificate reporting as defined in TEGL 17-05 common measures policy.

DWD staff consulted with representatives from the Division of Workforce Solutions (DWS) Child Care Section before formulating a response to the above-stated question. To meet the new certificate and training program definitions required by U.S. DOL, programs must meet a number of criteria that are outlined in WIA Policy Update 04-13. This response describes how this policy applies to day care centers as a career path, business opportunity and occupational cluster.

Is the program more than one course?

Regular Certification (Level II) and above meet this requirement. The Provisional certification (Level I) training does not meet this requirement. This determination is based on the WI Department of Health & Family Services certification requirements which grant provisional certification on the basis of completing training on Sudden Infant Death Syndrome (SIDS).

Does the program have a clear structure and standardized mechanism of delivery?

Level II certification includes at least 15 hours of instruction. The training component must follow the competency-based curriculum described in BHCE/BWP Operations Memo 03-49. Individuals are required to successfully complete a minimum of three courses: Introduction to Child Care Profession, Fundamentals of Family Child Care and Sudden Infant Death Syndrome (SIDS).

Does the program fulfill a specific set of occupational requirements with clear and measurable goals and objectives? Does the certificate holder have the required skills to be functional on the job on the first day of employment, with minimal supervision?

Training that is required for Level II certification and above, and that follows the competency-based curriculum is one step toward meeting this requirement. Day care certification requirements are clearly outlined in Chapter DWD 55. In addition to training, the individual must undergo criminal background checks, meet the qualifications for family day care, meet home and outside play area requirements, and comply with all other provisions of DWD 55.

Is the certificate transferable from one employer to another within the industry that recognizes the certificate?

Yes. Level II certification and above is recognized by day care center providers throughout the State of Wisconsin.

Is the certificate issued by one of the organizations listed in the certificate definition in WIA Policy Update 04-14?

Certification is managed by counties and tribal agencies. Certificates that are issued by the county or tribal agency meet the definition of "a public regulatory agency".

Is this a short-term training course that addresses only one skill set out of many?

Yes, but training is only one component of the day care certification requirements. Successful completion of the training program alone is not sufficient to claim credit for a certificate in WIA Title 1 performance measures. Documentation of successful completion of the training program plus proof of certification by a county or tribal agency will meet the certificate definition.

Day care certification has a continuing education requirement to renew certification. Counties or tribal agencies may require up to 5 hours of annual continuing education. Recertification occurs every two (2) years. If the participant is receiving training for the purposes of renewing the certificate, documentation of the continuing education activities plus proof of recertification by a county or tribal agency will meet the certificate definition.

Can the participant obtain employment in this occupation without successfully completing the program? Can the participant secure a license to practice skills acquired through the program? Is the license required to secure employment?

Successful completion of the training program alone is not sufficient to claim credit for a certificate in WIA Title 1 performance measures. Documentation of successful completion of the training program plus proof of certification by a county or tribal agency will meet the certificate definition.

Is successful program completion determined by a valid and reliable set of evaluation instruments?

Competency-based curricula that meet the standards outlined in BHCE/BWP Operations Memo 03-49 meet this requirement. The training certificate must be issued by the Registry of the Wisconsin Early Childhood Professional Recognition System.

Do employers in the day care industry recognize this certificate? Would they impose employment barriers because the program was completed in another State or regional location?

Level II certificates are recognized by employers throughout the State of Wisconsin, and therefore meet this requirement.

Is a certificate awarded if the participant fails to successfully complete the program, demonstrate competency and pass all required tests and examinations?

No. To receive Level II and above certification, the individual must meet all certification requirements as addressed in statutes and administrative rules.

4: Questions to Ask and Answer When Determining if a Training Program is Certificate-Eligible and Where to Look for the Answers

The following is a list of questions to consider when reviewing a program of instruction for certificate eligibility. The resources cited for each question are *examples* of the types of requirements or program policies to look for when attempting to answer the questions. The resources identified are not comprehensive; you may find other resources locally that also support your decision to define a program of instruction as "certificate-eligible". College course catalogues and degree/certificate requirements typically answer many of these questions to the extent necessary to make your determination. Employers who will hire certificate holders can also answer questions that a training catalogue doesn't.

Question 1: Is the program more than one course of instruction? If it is one course only, what can be expected of the participant after successfully completing the course?

What to look for:

- Program descriptions in college or training provider catalogues.
- Occupational licensing and certification requirements by the certifying agency.

Question 2: Does the training program have structure? Is there a standardized mechanism of delivery?

What to look for:

- Lesson plan(s)
- Curriculum
- Class syllabus
- Prerequisites - i.e., the program is completed through a series of training activities that build upon each other to expand the student's breadth and depth of knowledge and skills.
- Evidence based on lesson plans, curricula, etc. that instructors typically teach the course in the same sequence, according to the same schedule, each time the course is offered.

Question 3: Does the program fulfill a specific set of occupational requirements with clear and measurable goals and objectives? Can the certificate holder function effectively on the first day of employment with minimal supervision?

What to look for:

- Job qualifications or pre-requisites (e.g., licensure, certification or any other evidence the prospective employee must provide as evidence of competency in order to be hired).
- Once all training and testing is completed, what does the student obtain for his/her effort? (e.g., license to practice, certificates of competency, eligibility for higher levels of training and education).
- The individual can perform the work required by the occupation without additional training immediately after hiring. For example, an emergency medical technician

(EMT) can perform Cardiopulmonary Resuscitation (CPR) on a patient at the time of hiring by an ambulance service.

Question 4: Is the certificate and knowledge/skills transferable from one employer to another within the industry that recognizes the certificate?

What to look for:

- Employer hiring standards within the industry.
- Evidence of reciprocity across state or regional borders (i.e., no further training is required to secure the same job in another location, or minimal training requirements to account for regulatory differences associated with State licensing and certification laws/regulations.) For example, an EMT certified by the National Registry of EMTs in the State of Minnesota would be immediately eligible for EMT licensure and hiring in the State of Wisconsin.

Question 5: Who issues the certificate or license?

What to look for:

- Licensing or certification requirements identified by the training program provider.
- State, county, tribal or municipal licensing or certification regulations or requirements.
- Professional or industry endorsements and standards.
- Apprenticeship programs.

Question 6: Can the participant secure a job in the occupation without obtaining the certificate, credential or license? If all other job candidate qualifications are equal, which candidate would the employer choose: the one with the certificate or the one without it?

What to look for:

- Eligibility requirements for certificates, licenses or credentials.
- Continuing education requirements to renew certificates, licenses or credentials.
- Certificate, license or credential expiration dates.
- Length of time a certificate, license or credential is valid.
- Recertification requirements after a certificate, license or credential has expired.
- Employer requirements for maintaining current certification, licensure or credentials.
- Employer prerequisites to employment that state a preference for applicants with the certificate/credential.

Question 7: How is successful program completion determined?

What to look for:

- A written test must be passed to qualify for a license, certificate or credential.
- A practical skills test (if applicable) must be passed to qualify for a license, certificate or credential.
- The training program and courses have clearly stated pass-fail criteria that apply to all students.

- All students are tested according to the same sets of standards and criteria determined by the occupation to be minimally acceptable.
- Reasonable testing accommodations for individuals with disabilities measure the same standards and competencies as any other student who has participated in the program.

Question 8: Does an individual receive a certificate, license or credential even if he/she fails to pass the required tests or evaluations or is not evaluated for competency following program or course completion?

- Eligibility requirements for certificates, licenses or credentials.
- Minimum acceptable grade point average, examination score.
- Program and course attendance requirements.