# Attachment A
# Data Integrity and Performance Policy Handbook
# Revision 3

## September 8, 2026

**Employment System Administration and Policy**
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The WorkSource System is an equal opportunity employer/program. Auxiliary aids and services are available upon request to individuals with disabilities. Language assistance services for limited English proficient individuals are available free of charge.

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## Introduction

This procedural handbook accomplishes the following:

- Supersedes WorkSource System Policy 1020, Change 2, and the accompanying Data Integrity and Performance Policy Handbook.
- Serves as the mechanism to implement and manage current and future policy changes related to WIOA's primary indicators of performance. Provides guidance to staff and partners concerning WIOA, WorkSourceWA, data integrity, the state's management information system (the state MIS) and performance and reporting requirements, with the goal of understanding and complying with WIOA requirements.
- Provides Local Workforce Development Boards (LWDBs) with the relevant procedures and requirements to fulfill the expectations of Section 116 of WIOA, Training and Employment Guidance Letter (TEGL) 10-16, Change 3, and TEGL 14-18.

## Definitions

- **Certificate –** Awarded upon the successful completion of a brief course of study, usually one year or less but at times longer, primarily in public or private two-year institutions of higher education, university extension programs or non-degree granting postsecondary institutions like area career and technical education schools.
- **Credential** – A verification of an individual's qualification or competence issued by a third party with the relevant authority to issue such credentials. The term "credential" encompasses educational certificates, degrees, certifications, and government-issued licenses.
- **Data Element Validation (DEV)** – The federally mandated process by which the state assesses the accuracy of a sampling of reported participant data against source documents in program files for compliance with federal definitions (See TEGL 07-18 Change 1, TEGL 23-19 Change 3, and WorkSource System Policy 1003, Revision 7, Data Element Validation).
- **Eligibility Determination** – The staff-assisted process of determining program eligibility to facilitate a compliant program enrollment.
- **Enrollment** – The staff-assisted process of enrolling an individual in a WIOA program. Enrollment is not completed until the participant receives a participation-level service.
- **In-School** – A WIOA-eligible youth (U.S. citizen or legally entitled to work in the U.S., attending school as defined by state law, low income, age 14-21, and, if male aged 18 or older, registered for Selective Service), and who is one of more of the following: a) basic skills deficient; b) an English language learner; (c) an offender; (d) a homeless individual; (e) in foster care or has aged out of foster care; (f) pregnant or parenting; (g) has a disability; (h) requires additional assistance to complete an educational program or to secure or hold employment.
- **Out-of-School** – A WIOA-eligible youth (U.S. citizen or legally entitled to work in the U.S., not attending school as defined by state law, age 16-24, and if male aged 18 or older, registered for Selective Service), and who is one of more of the following: (a) a school dropout (see definition of "school dropout"); (b) has not attended school for at

least the most recent complete school year calendar quarter; (c) an eligible youth who has either graduated from high school or holds a GED, but is basic skills deficient (BSD), or an English language learner; (d) subject to the juvenile or adult justice system; (e) homeless; (f) in foster care or has aged out of foster care; (g) pregnant or parenting; (h) has a disability, or (i) low income and requires additional assistance to enter or complete an educational program or to secure or hold employment.

- **Participant (Title I-B Adult and Dislocated Worker)** - A reportable individual who has satisfied all applicable programmatic requirements for the provision of individualized or training services, per TEGL 10-16, Change 3. **Notes**: Eligibility must be determined before staff provide participation-level services (other than self-service or information-only), per TEGL 10-16, Change 3, and supportive services do not trigger or extend participation for Adults or Dislocated Workers.
- **Participant (Title I-B Youth)** – A reportable individual who has satisfied all applicable program requirements for the provision of services, including eligibility determination, an objective assessment, development of an individual service strategy, and has received one or more of the 14 WIOA Youth program elements, per TEGL 10-16, Change 3. **Note:** Supportive services, as a required program element, do trigger and extend participation for youth.
- **Registration** – The process of collecting and recording customer information, whether through staff-assisted registration procedures (the state MIS) or self-registration procedures (WorkSourceWA).
- **Significant Staff Involvement** – The point at which staff begin active involvement on the participant's behalf; based on a staff's assessment of a participant's skills, education or career objectives to assist the participant in making a decision or accessing information.
- **School Dropout** – An individual who is no longer attending any school and who has not received a secondary school diploma or its recognized equivalent.
- **State Management Information System (State MIS)** – For the purpose of Data Element Validation (DEV), state MIS refers to specific, detailed information that is stored in the state's information system that supports a data element.

In addition to the definitions listed above, the following terms will be used in this handbook:

- **WA Works** – The state's current management information system (state MIS). Data from this system is used for performance and reporting, including the calculation of common measures. Data integrity reports are pulled regularly to ensure timely and accurate data entry, which ultimately impacts the primary indicators of performance calculations. Participants receiving only self-services and informational activities are also reported.
- **WorkSource System** - The WorkSource system is Washington's statewide comprehensive WIOA one-stop delivery system for businesses and job seekers. In Washington, it is the cornerstone of the larger workforce development system – a network of core, required, and optional partners who have entered into official agreements to operate as an integrated one-stop service delivery system as envisioned by the Workforce Innovation and Opportunity Act. The WorkSource system includes physical comprehensive (full service), affiliate, specialized, and connection sites that

provide services at these sites, and virtual services. The WorkSource system is dedicated to addressing Washington's employment needs.

- **WorkSourceWA** – The website for online access to employment opportunities, resources and services of a statewide partnership of state, local and nonprofit agencies that provide an array of employment and training services to job seekers and employers in Washington.
- **Local Workforce Development Board (LWDB)** – plans, sets policies for and oversees the workforce programs and services funded under WIOA within their designated local area.

**References**

- Public Law 113-128, Workforce Innovation and Opportunity Act of 2014 (WIOA), Section 116 - Performance Accountability System
- Public Law 113-128, Workforce Innovation and Opportunity Act of 2014 (WIOA), Section 129(c) – Local Elements and Requirements
- Public Law 113-128, Workforce Innovation and Opportunity Act of 2014 (WIOA), Section 129(c)(2) – Program elements
- Public Law 113-128, Workforce Innovation and Opportunity Act of 2014, Section 134(b) – Local Employment and Training Activities
- Public Law 113-128, Workforce Innovation and Opportunity Act of 2014, Section 134(c) – Required Local Employment and Training Activities
- The Wagner-Peyser Act, as amended, Section 15
- 20 CFR Parts 603, 651, 652, et al
- 20 CFR 680.210 – Who may receive training services?
- 20 CFR Part 677 – Performance Accountability under Title I-B of WIOA
- 20 CFR Part 681 – Youth Activities under Title I-B of WIOA
- TEGL 23-14 – WIOA Youth Program Transition
- TEGL 10-16, Change 3 - Performance Accountability Guidance for Workforce Innovation and Opportunity Act (WIOA) Core Programs
- TEGL 19-16 – Guidance on Services provided through the Adult and Dislocated Worker Programs under WIOA and the Wagner-Peyser Act Employment Service (ES), as amended by Title III of WIOA, and for Implementation of the WIOA Final Rules
- TEGL 21-16 – Third WIOA Title I-B Youth Formula Program Guidance
- TEGL 26-16, Change 1 – Guidance on the use of Supplemental Wage Information to implement the Performance Accountability Requirements under the Workforce Innovation and Opportunity Act
- TEGL 07-18, Change 1 – Guidance for Validating Jointly Required Performance Data Submitted under the Workforce Innovation and Opportunity Act (WIOA)
- TEGL 14-18 – Aligning Performance Accountability Reporting, Definitions, and Policies Across Workforce Employment and Training Programs Administered by Department of Labor (DOL)
- TEGL 23-19, Change 3 – Guidance for Validating Required Performance Data Submitted by Grant Recipients of U.S. Department of Labor (DOL) Workforce Programs
- DOL-only Participant Individual Record Layout (PIRL) System – OMB Control Number 1205-0521
- National Reporting System for Adult Education - Approved Assessments
- Chapter 50.13 RCW – Privacy and Confidentiality
- WorkSource System Policy 1003, Revision 7 - Data Element Validation
- WorkSource System Policy 1011, Revision 7 - Determining Basic Skills Deficiency

- WorkSource System Policy 1031 – Management of Medical Disability Related Information
- WIOA Title I-B Policy 5403, Revision 2 - Records Retention and Public Access
- WIOA Title I-B Policy 5602, Revision 5 – Supportive Services and Needs-Related Payments
- WIOA Title I-B Policy 5620, Revision 1 – Follow-up Services for Adults and Dislocated Workers
- WIN 0077 - WorkSource Services Catalog

## 1. Service Delivery and Participation

### 1.1 Alignment of Wagner-Peyser and WIOA Title I-B Services

The underlying principle of the one-stop system (WorkSource system) is coordination of programs, services and governance structures so job seekers have relatively seamless access to a system of federally funded workforce investment services. WIOA provides five categories of services: basic career services, individualized career services, training services, supportive services, and follow-up services.

Note: There is no requirement for participation in one type of service before proceeding to the next type. The intent of WIOA is to allow flexibility based on each individual customer's assessed needs.

States and local areas must use the state MIS to document at least the minimum requirements required by law under WIOA (demographics, program participation information, and performance indicators) in order to take full advantage of the one-stop system's potential for efficiency and effectiveness. WIOA Title I-B programs and Wagner-Peyser (WP) are allowed to provide the same set of basic and individualized career services found at WIOA Section 134(c)(2)(A). There is a natural alignment of service delivery under WP since any individual legally entitled to work in the U.S. is eligible for these services.

TEGL 10-16, Change 3, emphasizes alignment of performance-related definitions, streamlining of performance indicators, reporting integration, and comparable data collection and reporting across WIOA core programs. The state MIS supports WIOA's intent as it is used by multiple WorkSource-affiliated programs beyond Department of Labor (DOL)-funded programs and these programs are part of integrated case management and performance.

Note: Personal records of WIOA registrants are private and confidential and must not be disclosed to the public. Refer to WIOA Title I-B Policy 5403, Revision 2, Records Retention and Public Access and RCW 50.13 for additional guidance on data privacy and security.

#### 1.1.1 Basic Career Services, Self-Services, and Informational Services

Wagner-Peyser Employment Services (WP) basic career services can be provided to all job seekers and employers and are available through self-services, facilitated self-help services, and staff-assisted services to ensure universal access (20 CFR 652.207(b)(2) and 652.208). Only individuals who are legally entitled to work in the U.S. can receive assistance obtaining employment.

In addition to universal access under Labor Exchange, certain services, such as self-service or informational services, can be provided universally with WIOA Title I-B funding.

Self-service and informational services are those basic career services that are readily available to and accessible by the general public. They are designed to inform and educate

individuals about the labor market, their employment strengths and weaknesses, the range of services appropriate to their situation, and to provide instructions on how to use one-stop resources. These services do not require significant staff engagement or an assessment of the individual's skills, education, or career objectives.

Self-service occurs when individuals serve themselves by accessing WorkSource information and tools, including WorkSourceWA, either at a one-stop site or from a remote electronic location. For reporting purposes, it is necessary for self-service participants to be identifiable. Because WIOA Title I-B and Wagner-Peyser funds support development of the WorkSourceWA infrastructure, self-servicing individuals and those that receive information only services are included in Wagner-Peyser reportable individual count. Individuals that start the eligibility process but do not enroll in a WIOA Title I-B program will be in both the Wagner-Peyser and an applicable Title I-B program reportable individual counts. However, reportable individuals who only obtained WIOA-affiliated self-service and information are not participants in any program and therefore are excluded from WIOA performance measures.

Basic career services may be informational (self-services and staff-assisted services), but it is important for staff to understand the point at which a basic career service requires more significant staff involvement. This determination can be based on assessment results of the participant's inability to obtain employment through self-service alone.

However, individuals must be determined eligible and enrolled to receive staff-assisted Wagner-Peyser or WIOA Title I-B funded services beyond self-service or informational services. These services are offered under Wagner-Peyser and WIOA Title I-B to ensure seamless service.

### 1.1.2 Significant Staff-Assisted Services (Participation-level Services)

A significant staff-assisted service is any assistance provided by staff beyond the informational services (i.e., readily available information) described above, regardless of the length of time involved in providing such assistance. Significant staff involvement includes staff assessment of an individual's skills, education, or career objectives in order to assist with any of the following:

- Determination of appropriate next steps in the search for employment, training, and related services, including job referral;
- Assessment of personal barriers to employment; or
- Access to other services necessary to enhance employability and individual employment related needs.

Staff-assisted services are captured in the state MIS.. Accurate data entry for types of services and dates of service is critical to implementation of federal Primary Indicators of Performance in Washington.

A significant staff-assisted service is one that triggers an individual's inclusion as a participant in one of the following funded programs listed below. Such **participation-level**

**services** are entered into the state MIS and included in federal reporting as required in the Participant Individual Record Layout (PIRL):

**Core DOL WIOA Programs**

WIOA Title III Wagner-Peyser Employment Service (WP)

- WP Migrant and Seasonal Farm Workers (MSFW)

WIOA Title I-B

- Adult
- Dislocated Worker
- Youth

**Additional Programs**

- National Dislocated Worker Grants (DWG)
- Trade Adjustment Assistance (TAA)
- Jobs for Veterans State Grants (JVSG)

In an effort to avoid misinterpretation and provide consistency across all programs, the WorkSource Services Catalog, which is accessible on the Workforce Professionals Center website (wpc.wa.gov), under the One-Stop System or Technology tabs, defines each service and its applicability to participation and performance measurement. Refer to Section 4 for more information.

### 1.1.3 Individualized Career Services

Individualized career services are those services that have been customized to address an individual's needs. They may be provided under the WP Act (WIOA Title III) and WIOA Title I-B.

Individualized career services funded under the WP Act are available universally to all job seekers who are seeking to obtain employment, retain employment, or increase earnings, and may benefit from WorkSource services.

Adults and Dislocated Workers who receive services funded under WIOA Title I-B (other than self-service or informational activities) must be determined eligible and enrolled. Participants receiving individualized career services funded under WIOA Title I-B must be determined eligible, enrolled, and deemed to be in need of individualized career services in order to obtain or retain employment. Individualized career services include comprehensive assessments, development of individual employment plans and counseling and career planning.

See Section 2 of this Handbook for information regarding Youth Program enrollment and participation.

### 1.1.4 Training Services

Training services are funded by and provided to individuals under the WIOA Title I-B programs. Participants receiving training services funded under WIOA Title I-B must be registered, determined eligible and in need of additional service, beyond career services, in order to obtain or retain employment (20 CFR 680.210). Training services include:

1. Occupational skills training
2. On-the-job training
3. Incumbent worker training
4. Workplace training with related instruction
5. Increased capacity training
6. Skill upgrading and retraining
7. Entrepreneurial training
8. Customized training
9. Apprenticeship training
10. Pre-Apprenticeship training
11. Adult education and literacy activities, including English language acquisition and integrated education and training programs, provided concurrently or in combination with any of training services cited above

### 1.1.5 Supportive Services

The provision of a supportive service is based on assessment and identification of the need for a supportive service. The point in time at which the service is documented in the state MIS may differ between local areas based on their processes.

Per TEGL 19-16, supportive services, which neither trigger participation nor extend the date of participation (i.e., extend exit) cannot be provided as stand-alone Title I-B services for adults and dislocated workers. The supportive service can be recorded on or after the date of the career or training service and should include a case note explaining how the supportive service connects to a career or training service.

Also, per TEGL 19-16, adult and dislocated worker recipients of Title I-B-funded supportive services must be Title I-B participants even if they only need a Title I-B-funded supportive service to successfully participate in training paid by non-Title I-B- funded service providers that do not or are unable to provide supportive services (e.g., TAA, state Worker Re-Training Program, Vocational Rehabilitation, Adult Education). **Supportive services do not trigger or extend participation, therefore there must be an accompanying Title I-B-funded staff-assisted career or training service to trigger or extend participation. This makes the Title I-B-funded supportive service allowable when a training is paid by non-Title I-B funding sources**.

For WIOA Title I-B youth, supportive services can be provided either during participation or after exit as Program Elements 7 and 9, respectively, per TEGL 21-16, though the former triggers and extends participation while the latter does not.

Per TEGL 10-16, Change 3, and TEGL 19-16, Attachment II, individuals in incumbent worker training are not eligible to receive supportive services unless they meet eligibility for and are co-enrolled in either the WIOA Title I-B adult or dislocated worker programs and receive a participation-level career service or training. In other words, supportive services cannot be provided to individuals who are in incumbent worker training only.

Note: Food and groceries are prohibited as supportive services for adults as DOL has determined that they are beyond the scope of WIOA. However, the state's supportive services definition in WIOA Title I-B Policy 5602, Revision 5, allows food to be provided to Title I-B youth as a supportive service at a reasonable cost and on a limited basis and in certain situations if it assists or enables them to participate in allowable youth program activities and to reach their employment and training goals.

See WIOA Title I-B Policy 5602 Revision 5, Supportive Services and Needs-Related Payments, for additional information.

#### 1.1.6 Follow-Up Services

Follow-up services are provided in response to real customer needs, and data entered should accurately reflect the services provided. However, TEGL 10-16, Change 3, and TEGL 14-18 specifically exclude follow-up services from performance calculations because they are services designed to support customers after their successful placements or achievements. See Section 2.3.5 regarding follow-up services for youth and Section 3.1 regarding use of follow-up services for adults and dislocated workers.

### 1.2 Case Management

The decision to initiate WIOA Title I-B case management must be at the point at which staff involvement is needed to provide the services that will assist the recipients of those services in achieving their goals. When performing case management, recording services and actions taken on the dates they occur supports accuracy and continuity. Providing case management by itself (answering questions, confirming information) does not equate to a service being recorded in the state MIS. If the case management activity does not meet any of the service definitions in the Service Catalog, a service should not be recorded.

### 1.3 Case Note Guidance

WIOA provides an opportunity for a greater emphasis on customer-focused and effective case management. Integral to this approach is the utilization of multiple techniques to address and provide solutions for a variety of barriers and assessed needs of participants. Recording case notes is critical because it weaves each service element into a comprehensive service plan. Individualized case notes provide a complete, accurate, and

concise explanation of frequency and type of contact with participants, including the types of services provided and the outcomes associated with those services.

Case notes are a tool to help service providers organize and analyze the information gathered on participants and to plan case management strategies. It is imperative that LWDBs, their Title I-B sub-contractors, one-stop system partners, and federal and state monitors and auditors be able to recognize and discern each service and expenditure provided to, and made on behalf of, a one-stop system customer.

**Additional Considerations**

- Information contained in case notes belongs to participants.
- Case notes are legal documents that may be subpoenaed by the courts or disclosed through public records requests.
- Case notes are also used to represent the local WIOA Title I-B and WP activities and their compliance with federal, state, and local policies.
- Case files and case notes are subject to monitoring and data validation reviews.

Any case notes containing confidential medical information must be kept separately in a secure location apart from participants' regular program files (see WorkSource System Policy 1031).

Case notes should not be entered to represent service delivery without also entering a participation-level service from the WorkSource Services Catalog. In other words, case notes do not represent documentation of services and are not substitutes for proper entry of services in the state MIS.

## 1.4 Participation and Program Completion

### 1.4.1 Reportable Individuals

*Reportable individuals* are those who engage the WIOA one-stop system on an initial level as described in 20 CFR 677.150. This includes two categories: (1) those who are also participants in a given program and (2) those who do not meet the requirements to become participants. For the purposes of performance reporting, the second category represents "reportable individuals" who take part in self-services, receive information-only services or activities, or do not complete the program requirements for eligibility or for participation. Reportable individuals have taken action that demonstrates an intent to use program services and who meet specific reporting criteria of the program, including:

1) Individuals who provide identifying information (including those what are determined ineligible to become participants for a particular program or programs);
2) Individuals who only use the self-service system;
3) Individuals who only receive information-only services or activities; or
4) For purposes of the Title IV program only, students with a disability that solely receive pre-employment transition services and do not apply for vocational rehabilitation

services, who are not determined eligible, and who do not have approved Individualized Plan for Employment (IPE).

### 1.4.2 Participants

While *participant* is defined consistently across WIOA core programs, there are slight differences based on program requirements.

For the WIOA Title I-B Adult, Title I-B Dislocated Worker, and Title III Wagner-Peyser Employment Service programs, participants are reportable individuals who have received services other than the self-service or information-only services described in 20 CFR 677.150 after satisfying all applicable programmatic requirements for the provision of services, such as eligibility determination.

For the WIOA Title I-B Youth program, participants are reportable individuals who have satisfied all applicable program requirements for service provision, including eligibility determination, an objective assessment, development of an Individual Service Strategy, and receipt of one or more of the 14 WIOA Youth program elements identified in Section 129(c)(2) of WIOA.

### 1.4.3 Date of Participation

For adults, the date of participation is the date when a participation-level service is delivered. For youth, the date of participation is when all applicable program requirements for the provision of services, including eligibility determination, objective assessment, development of an individual service strategy, and receipt of one or more of the 14 WIOA Youth program elements occur.

### 1.4.4 Program Completion Date

The program completion date is the date of the final program-funded participation-level service. This date is entered into the state MIS by staff.

Note: Individuals who have completed program participation enter a follow-up period to support their continued success (see Section 2.3.5 for youth and Section 3.1 for adults and dislocated workers). However, if at any time they return in the 90-day period, they must be provided participation-level services as needed.

## 1.5 System Exits

“Exit” refers to a participant who has not received a qualifying participation-level service (funded by the programs listed below) for 90 consecutive calendar days and is not scheduled to receive future participation-level services.

**Core DOL WIOA Programs**

WIOA Title III Wagner-Peyser Employment Service (WP)

- WP Migrant Seasonal Farmworkers (MSFW)

WIOA Title I-B

- Adult
- Dislocated Worker
- Youth

**Additional Programs**

- National Dislocated Worker Grants (DWG)
- Trade Adjustment Assistance (TAA)
- Jobs for Veterans State Grants (JVSG)

This definition supports the integrated service philosophy and acknowledges that a system exit is a common exit from all qualifying WorkSource system programs.

Note: “Program completion” should not be confused with system exit since completion of one program does not necessarily mean the participant has reached a true exit.

### 1.5.1 System Exit Date

“Exit Date” is an auto-exit that is a system-derived date determined after participants have not received any participation-level service for 90 consecutive calendar days and are not scheduled to receive future services. In accordance with the requirements of TEGL 14-18, the exit date is applied retroactively, after a 90-consecutive day period without participation-level services, back to the last day on which individuals received participation-level services provided by any program included in this policy. Individuals who are participating in more than one program will have a single common exit date based on the last completed participation-level service. This ensures that the exit date is the same as the last date of service for all programs in the participation period.

### 1.5.2 Planned Future Services

When future services are planned more than 90 days after the most recent date of service, such as might happen when there is a delay before the beginning of training, participants must receive a participation triggering service before 90 days have elapsed to prevent the participant from being automatically exited.

## 1.6 Exclusions from Performance Measures

Exclusions from performance measures may only be used for participants who present one of the following reasons for exclusion from all performance measures:

- Institutionalized or Incarcerated;
- Health/Medical expected to last longer than 90 days;
- Deceased (the only exclusion that can be linked to non-participants)
- Reserve Forces Called to Active Duty for at least 90 days;
- Foster Care (Youth only).

### 1.6.1 Reportable Individuals Receiving Incumbent Worker Training

Individuals receiving incumbent worker training (IWT) are reportable individuals and not participants for the purpose of inclusion in WIOA performance calculations. However, unlike other reportable individuals, states and local areas are still required to report certain participant and performance data on reportable individuals who receive only incumbent worker training. The required elements for these type of incumbent worker individuals are limited to the appropriate reportable individual code ("4" in PIRL 903 or PIRL 904), basic information, and the outcome elements needed to calculate incumbent worker training performance indicators, which mirror WIOA primary indicators of performance. Reportable individuals do not report a Date of Program Entry or Date of Program Exit. Reportable individuals receiving IWT through the Title I-B Adult or Dislocated Worker programs must be reported in PIRL 907. State and local boards may require additional elements be reported to collect additional information on incumbent workers, which, if collected, should also be reported through the PIRL. Refer to Attachment VIII of TEGL 10-16, Change 3, for IWT required data elements.

## 1.7 Program Completion Reports

The state MIS provides reports to enable program staff to review information such as:

- When the participant completed service participation;
- If the participant received a subsequent participation-level service and by which program; and
- How long it has been since the participant last received a participation-level service.

Case management reports providing program enrollment end dates, exit dates, and completion dates are available within the state MIS so that service providers can determine their caseloads and associated activity.

Note: The Exit Date and associated Completion dates are intended to help staff understand participation periods. Follow-up services do not impact exit and should begin as needed or required (e.g., WIOA youth program requires 12 months of follow up) (i.e., when all needed services have been provided). Refer to Section 3.1 for more information on follow-up services for adults and Section 2.3.5 for youth.

Note: It is imperative that staff enter appropriate services from the Services Catalog that align with and affirm the services being delivered.

## 1.8 Service Participation and New Participation Periods

Individuals who receive a participation-level service, in a physical location or remotely via electronic technologies, are part of "service participation." Individuals receiving only self-services and/or informational services are not considered participants but are only included in the "reportable individual" WP and WIOA Title I-B counts.

If individuals need to reengage with the system, their participation episode will continue with the delivery of more services; otherwise, they will be system-exited after 90 consecutive days have elapsed (Section 1.5.1).

Note: Follow-up services are delivered when the participant still needs services to ensure continued success. However, a new program enrollment and participation period will preclude the delivery of follow-up services from a prior enrollment. Follow-up services delivered within consecutive 90 days of the last participation-level service can be used to establish that participants do not need to be reengaged with qualifying services (as listed in the Services Catalog) prior to exit.

### 1.8.1 Open Durational Services

Open durational services (no end date) prevent participants from system exit. Reports that support management of such open durational services are available in the state MIS under the Reports tab.

## 1.9 Performance Participation

Not all individuals are included in performance unless they receive a staff-assisted participation level service tailored to their needs. However, staff must remember to complete eligibility prior to giving the service.

Participants in the Adult and Dislocated Worker programs are counted in performance calculations if they receive a significant staff-assisted service or a service tailored to their needs funded by the program at either a physical location or remotely through electronic technologies. Staff must ensure additional eligibility determination requirements are completed before provision of staff-assisted basic and individualized career or training services.

Participants in the Youth program are included in performance if they have satisfied all applicable program requirements for the provision of services, including eligibility determination, an objective assessment, development of an individual service strategy, and receipt of one or more of the 14 WIOA Youth program elements.

For WIOA Title III, all Wagner-Peyser participants are counted in performance if they receive a participation-level career service that is not considered self-service or informational services.

For TAA, participants are those who enroll in TAA and receive a TAA-funded participation-level service.

For WorkFirst (WF), Job Search participants and all other Temporary Assistance for Needy Families (TANF) recipients are counted in state WF performance.

For Reemployment Services and Eligibility Assessment (RESEA), Unemployment Insurance (UI) claimants referred to the RESEA program are enrolled in the Wagner-Peyser program during the initial appointment.

For JVSG, performance participants are those who are enrolled and receive a JVSG-funded participation-level service.

## 1.10 Real-Time Data Entry

In the interest of data integrity, it is imperative, to the fullest extent possible, that data entered into the state MIS accurately reflect the service provided at the time the service is provided. Therefore, the minimal MIS data entry requirements are as follows:

- Services must be entered at the point in time they are delivered.
- If services cannot be entered at the time they are delivered, they must be entered within 14 calendar days of service delivery and the service date entered must always reflect the date the service was delivered.

Note: These data entry limitations do not impact the follow-up services or placement information services. This requirement will only limit staff to entering Start Dates for services within 14 calendar days of providing the service. In addition, this requirement will not prevent staff from appropriately updating/editing the End Date, Date Withdrawn from Training, Notes, Contract and other data fields.

### 1.10.1 Basic and Individualized Career, Training, and Support Services

For any Activity Start Date for Basic and Individualized Career, Training and Support service errors identified after the 14-day calendar restriction, staff must correct the errors and request Supervisor approval for the correction. Supervisor approval must be documented with a case note. The case note must identify the service name, the reason for the correction, and the Supervisor's review and approval of the correction.

Case Note Example:
"The [enter service name, i.e.: Occupational Skills] service that was provided on [date service occurred] was not entered within the 14-day allowable timeframe. As a Supervisor, I have reviewed and approved the late entry."

### 1.10.2 Accuracy of Service Entries

Not all services in the MIS count for performance participation. When a service is provided, the appropriate qualifying service must be identified, even if case notes are entered. It is important to note that:

- Qualifying services are identified in the WorkSource Services Catalog.
- Follow-up services, self-service and providing workforce information do not trigger or extend participation, nor do they factor into performance calculations.
- Services must only be entered when delivered to a participant and only the actual services delivered must be entered.
- Case notes should support, not contradict, service entries.
- Case notes should not be entered to represent service delivery without also entering a qualifying service from the WorkSource Services Catalog.
- Case notes can refer to voice or e-mail messages left for or sent to participants. However, such case notes are not a reportable service.

### 1.10.3 Risks of Non-Compliance

Delaying the exit of successfully placed participants puts local areas at risk of losing positive outcomes for WIOA common measures as well as losing the timely capture of successful participants in the federal reports. Intentionally delaying exit also increases the risk of data validation findings.

### 1.10.4 Late Entry Reports in the state MIS

Reports to identify late service entry are available in the MIS. The report can identify all services where the service date entered is prior to the date it was inputted into the MIS.

## 2. Youth Program

### 2.1 Recording a WIOA Title I-B Youth Program Element to Trigger Participation

Section 8 of TEGL 10-16, Change 3, states that a WIOA Title I-B youth program enrollee transitions from a reportable individual to a participant only after having "satisfied all applicable program requirements for the provision of services, including eligibility determination, an objective assessment, development of an individual service strategy, and--**received one or more of the 14 WIOA Youth program elements** identified in Section 129(c)(2) of WIOA."

Therefore**,** Title I-B youth case managers must ensure that Title I-B youth receive at least one WIOA youth program element available in the WorkSource Services Catalog and that the service(s) are recorded in the MIS to ensure those youth become participants.

### 2.2 Recording Youth Program Elements provided by partner programs

To support accurate federal reporting, the U.S. Department of Labor (DOL) has informed the State that WIOA Title I-B youth program staff must record in the state MIS any services

provided to WIOA Title I-B youth program participants that meet the definition of WIOA youth program elements even if the services were provided by non-WIOA Title I-B providers and paid for with non-WIOA Title I-B funds.

For example, an Individual Service Strategy (ISS) for a WIOA Title I-B youth program participant lays out a plan for the participant to receive several youth program elements from separate providers that collectively represent a package of comprehensive services that meet the participant's needs. Work experience (Program Element 3) and supportive services (Program Element 7) will be delivered by a Title I-B provider, financial literacy education (Program Element 11) will be delivered by a school district, and adult mentoring (Program Element 8) will be delivered by a non-profit youth organization. As each of those youth program elements are initiated, the WIOA Title I-B youth program case manager records them in the state MIS, including those provided by non-WIOA Title I-B providers so long as the service provided meets the definition of a WIOA youth program element.

WIOA Title I-B staff must document the full extent of youth program elements provided to WIOA Title I-B youth participants regardless of fund source to capture the extent to which the delivery of youth program elements is being achieved through integrated service delivery and leveraging.

In terms of supporting documentation, DOL expects to find references to youth program elements delivered by non-WIOA providers in the ISS or case notes. Because youth program elements delivered by non-WIOA Title I-B providers do not involve the expenditure of WIOA Title I-B funds, WIOA Title I-B youth program staff do not need to obtain or retain any fiscal documentation related to those services and there should be no issues around questioned or disallowed costs from a Title I-B perspective.

## 2.3 Supplemental State Guidance for the WIOA Title I-B Youth Program

### 2.3.1 High School Equivalency Programs and Dropout Reengagement Programs

Section 4 (page 3) of TEGL 21-16 on high school equivalency programs and dropout re-engagement programs states that "youth attending high school equivalency (HSE) programs, including those considered to be dropout re-engagement programs, funded by the public K–12 school system that are classified by the school system as still enrolled in school are considered In-School Youth (ISY)."

Washington's Open Doors program, which is cited in Revised Code of Washington (RCW) and Washington Administrative Code (WAC), recognizes a range of models or approaches with varying degrees of school or school district engagement. As a result, DOL acknowledges that Washington's ISY and Out of School Youth (OSY) determination is situational and largely dependent on the degree to which schools and school districts participate as service providers and funders in dropout re-engagement programs.

If schools or school districts, despite having enrolled the youth into school, largely cede service provision to other entities, such as WIOA Title I-B youth providers, community-based organizations, or other non-profits, have minimal financial investment, and require little district-based accountability of participants, youth in those programs can be designated OSY.

Conversely, if schools or school districts are substantially directive, invested, and accountable (e.g., WIOA Title I-B Youth program only provides supportive services to participants), those youth should be designated ISY.

This also applies to dropout re-engagement programs not connected to Open Doors. Based on the guidelines cited above, local areas must thoroughly document the case for OSY designation when youth participants in dropout re-engagement programs are enrolled in school.

### 2.3.2 Homeschooled Youth

Section 4 (page 3) of TEGL 21-16 conditions the designation of homeschooled individuals as either ISY or OSY based on state and/or local education agency policies. In Washington, state statutes for the Office of Superintendent of Public Instruction (RCW 28A.200, 28A.225(010(4)) articulate the requirements for being recognized as a homeschooled individual. Individuals whose homeschooling activity meets those requirements can seek eligibility as ISY; if they do not, they need to meet OSY eligibility criteria.

### 2.3.3 Youth Offender Status

Section 4 (page 4) of TEGL 21-16 addresses eligibility related to "offender" status for both ISY and OSY. An individual who has been charged with an offense but subsequently directed to a community-based diversion program rather than the formal court system meets the definition of having been "subject to any stage of the criminal justice process" due to having been *charged* with an offense, even though that individual has not been remanded to the court system.

To address a broader concern, when individuals rely solely on ISY Category 3 or OSY Category 4 criteria as the additional determinants of eligibility for the Title I-B youth program and express concerns about documentation and disclosure of their offender status, DOL has stated that the offender status must be captured and reported so DOL and Congress can know whether or not states and local areas are adequately serving individuals with, in this case, employment barriers related to ex-offender status. Accordingly, offender status is a required reporting element in the PIRL.

<u>Low-Income Determination:</u>

Section 4 (page 5) of TEGL 21-16 on "Low-Income Determination" cites 70 percent of the Lower Living Standard Income Level (LLSIL) as part of a low-income determination for Title

I-B youth. Refer to the latest version of WIN 0056, Lower Living Standard Income Level by Family Size, for guidance on low-income determinations.

### 2.3.4 Assessment Requirements

Section 5 (pages 7-8) of TEGL 21-16 on "Assessment Requirements" states that local areas are not required to use assessments approved for use in the Department of Education's National Reporting System (NRS) for the basic skills assessment portion of the objective assessment, though they can. Furthermore, TEGL 21-16 requires local areas to use an NRS-approved assessment for both the pre-test and post-test if measuring Educational Functioning Level (EFL) for the purpose of documenting Measurable Skill Gains after program enrollment. CASAS is one of the approved assessments for measuring EFL, but other approved assessments can also be used. However, the same assessment tool must be used for both pre-test and post-tests. WorkSource System Policy 1011, Revision 7, Determining Basic Skills Deficiency, outlines allowable assessments.

Note: Assessments conducted for adults are participation-level services whereas objective assessments conducted for Title I-B youth must be combined with both eligibility determinations and the delivery of at least one youth program element to trigger participation.

### 2.3.5 Follow-Up Services

Section 7 (pages 19-20) of TEGL 21-16 on "Program Element 9: Follow-Up Services" states that allowable activities include: (1) supportive services; (2) adult mentoring; (3) financial literacy education; (4) services that provide labor market and employment information about in-demand industry sectors or occupations available in the local area, such as career awareness, career counseling, and career exploration services; and (5) activities that help youth prepare for and transition to postsecondary education and training.

Those five activities are also youth program elements in their own right. It is important to note, however, that none of those five activities extend participation when delivered as part of post-exit follow-up services whereas all of those five activities do trigger and extend participation when delivered as program elements during participation.

In addition to follow-up services themselves, information obtained during follow-up can also be entered in the state MIS to support reporting and reflect accurate customer information. Such information, which must be documented in compliance with WorkSource System Policy 1003, Revision 7, Data Element Validation, includes:

- Credential information
- School status (required reporting for youth programs)
- Supplemental employment information, including employment related to training

### 2.3.6 Entrepreneurial Skills Training

Section 7 (page 21) of TEGL 21-16 on "Program Element 12: Entrepreneurial Skills Training" does not state whether or not the entrepreneurial training programs need to be on the state's Eligible Training Provider List (ETPL). The types of entrepreneurial skills training described in 20 CFR 681.560 do not require the training provider/program to be on the state's ETPL. That said, if the entrepreneurial skills training involves an Individual Training Account (ITA) to pursue a degree- or certificate-bearing entrepreneurship training program, the program/provider must be on the state's ETPL.

### 2.4 School Status at Exit for WIOA Title I-B Youth Participants

DOL requires states to report the school status at exit in PIRL Element 1812 for all WIOA Title I-B youth program participants.

To address the issue, staff must enter data on youth school status at exit into the state MIS in the following sequential order of precedence:

(1) School status at exit if known (the most accurate outcome);
(2) Last known documented school status, after participation has begun, if school status at exit is unknown;
(3) School status at start of participation if school status at exit is unknown and there is otherwise no documentation as to school status other than that at start of participation.

By following the aforementioned order of precedence, staff will be recording the last known school status of WIOA Title I-B youth participants. This will ensure that state MIS has the required data so that no records are rejected or excluded from our federal performance reports for lack of this data element.

## 3. Use of Follow-Up for Adults and Dislocated Workers

### 3.1 Follow-Up Services

Once adult participants have successfully achieved their goals, follow-up services delivered after goal achievement are designed to ensure job retention, wage gains, and career progress and do not extend participation periods (refer to Section 1.4 for more information on new participation periods).

Staff must use the Follow-Up service to reflect when such a service is given to WIOA participants after exiting participation. See WIOA Title I-B Policy 5620, Revision 1, Follow-Up Services for Adults and Dislocated Workers, for information regarding follow-up services.

In addition to follow-up services themselves, information obtained during follow-up can also be entered in the state MIS to support reporting and reflect accurate customer information. Such information, which must be documented in compliance with WorkSource System Policy 1003, Revision 7, Data Element Validation, includes:

- Credential information

- School status
- Supplemental employment information, including employment related to training
- Wages
- O*NET codes for employment

Staff must follow the Exit guidelines outlined in Section 1.5 in conjunction with proper use of follow-up services.

## 4. Services Catalog

The WorkSource Services Catalog is the list of active services that represents services delivered to job seekers within the DOL-funded part of the WorkSource system. The catalog also contains the definition of each service, so users can select the service that best represents the job seeker activity. Services are categorized as Basic and Individualized Career, Training, Support and Youth Only. Required Business Services and State EcSA Services are on a separate tab. Review WorkSource System Policy, 1037 WorkSource Services Catalog.

The intended use of the Services Catalog is outlined in Section 4.3.

### 4.1 Participant Services

All participant services available in the state MIS are described in the Services Catalog, which is a living document in that services may be deactivated or activated based on updated guidance or changing system needs.

### 4.2 WorkSource Services Catalog Changes and Structure

The WorkSource Services Catalog and all relevant changes are communicated through WorkSource Information Notice (WIN) 0077 and all associated change versions.

The catalog lists all job seeker and business services available in the state MIS, along with a business definition, federal citation (where applicable), whether or not it triggers and extends participation, and whether or not it is a durational service. The additional details enable staff to select appropriate services for job seekers, which supports data integrity and outcome measurement.

#### 4.2.1 Service Creation

Formal requests to amend the WorkSource Services Catalog (create new services and update or eliminate existing services) must be submitted to ESD using the WorkSource Governance Solution Request found on the Workforce Professional Center website.

WorkSource Services Catalog requests are routed through the WorkSource Governance process, in consultation with ESD's Employment System Administration and Policy (ESPI)

unit and Information Technology Services Data Integrity Team (participant services) and Data Solutions Team (business services).

#### 4.2.2 Service Review

Services within the Services Catalog are reviewed by ESD's Data Integrity, Employment System Administration and Policy, and Workforce Monitoring units, including usage, distribution of use across areas, and applicability to current guidance or policy direction. Final decisions on the results of the review, such as continuing, amending, or deactivating services, are made by the Data Integrity Team in consultation with the Employment System Administration and Policy Unit.

### 4.3 Use of the Services Catalog

Services within the catalog are the source data for performance and outcome measurements across the WorkSource system. Stakeholders within the system must review the Services Catalog on a regular basis to ensure their knowledge of available services and definitions is maintained. Workshop services represent multiple services delivered within that specific class. Staff must not select multiple services to represent a single class. They must instead select the service that most closely resembles the service provided.

## 5. Performance Measurement Systems

Washington uses the WIOA Federal Primary Indicators of Performance as its performance measurement system to provide outcome information.

### 5.1 WIOA Federal Primary Indicators of Performance

The value of measuring all core programs against WIOA primary indicators of performance is to communicate a common set of outcome results for all programs that comprise the federally funded national workforce development system.

By minimizing the different reporting and performance requirements, common performance indicators facilitate the integration of service delivery, reduce barriers to cooperation among programs, and enhance the ability to assess the effectiveness and impact of the workforce investment system. In addition, a common performance reporting system streamlines the process to derive WIOA Title I-B and WP performance outcomes.

WIOA collapsed the performance data and reporting into a single file called the Participant Individual Record Layout (PIRL). All Title I-B and III and TAA participants and outcomes are tracked via this file. The Departments of Labor and Education have also created a Joint PIRL which tracks all WIOA participants from all five Titles, as well as TANF, in accordance with WIOA Section 116 and 20 CFR Part 677.

In Washington, per 20 CFR 677 Subpart C, the Workforce Training and Education Coordinating Board (WTECB) engages DOL to negotiate Washington's statewide levels of

performance. In turn, each of the state's local areas negotiate with the WTECB biannually to establish Title I-B local area performance goals for the next two program years for the Adult, Dislocated Worker, and Youth programs.

The WIOA Federal primary indicators of performance apply to all programs listed in Section 1.1.2.

Under WIOA Section 116(b)(2)(A) and 20 CFR 677.155, there are six primary indicators of performance, listed below. Refer to TEGL 14-18 and its attachments for additional details and information regarding performance accountability for specific programs (e.g., JVSG, TAA and NDWG).

For the first two indicators, there is a modified indicator for the WIOA Title I-B program:

1. Employment Rate – 2nd Quarter After Exit: The percentage of participants who are in unsubsidized employment during the second quarter after exit from the program.

   Youth Education or Employment Rate – 2nd Quarter After Exit: The percentage of participants in education or training activities, or in unsubsidized employment, during the second quarter after exit.

2. Employment Rate – 4th Quarter After Exit: The percentage of participants who are in unsubsidized employment during the fourth quarter after exit from the program.

   Youth Education or Employment Rate – 4th Quarter After Exit: The percentage of participants in education or training activities, or in unsubsidized employment, during the fourth quarter after exit.

3. Median Earnings – 2nd Quarter After Exit: The median earnings of participants who are in unsubsidized employment during the second quarter after exit from the program.

   Note: If UI wage data are not able to document earnings and supplemental wage information is used instead, TEGL 10-16, Change 3, requires that the reported earnings be validated by allowable documentation cited in TEGL 7-18: follow-up survey from program participants, paycheck stubs, tax records, W-2 form, quarterly tax payment forms (e.g., IRS Form 941), document from employer on company letterhead attesting to an individual's employment status and earnings, self-employment worksheets signed and attested to by program participants, or detailed case notes verified by employer and signed by the case manager. If the supplemental wages obtained are not provided in the form of quarterly wages, the Wage Conversion Chart (Attachment III of TEGL 10-16, Change 3) must be used to convert them into quarterly wages.

4. Credential Attainment - The percentage of those participants enrolled in an education or training program (excluding those in on-the-job training (OJT) and

customized training) who attain a recognized postsecondary credential or a secondary school diploma, or its recognized equivalent, during participation in or within one year after exit from the program. A participant who has attained a secondary school diploma or its recognized equivalent is included in the percentage of participants who have attained a secondary school diploma or its recognized equivalent only if the participant also is employed or is enrolled in an education or training program leading to a recognized postsecondary credential within one year after exit from the program.

5. Measurable Skill Gains (MSG) - The percentage of program participants who, during a program year, are in an education or training program that leads to a recognized postsecondary credential or employment and who achieve at least one MSG, defined as documented academic, technical, occupational, or other forms of progress, towards such a credential or employment.

   Depending on the type of education or training program, documented progress is defined as one of the following:

   a) Documented achievement of at least one educational functioning level of a participant who is receiving instruction below the postsecondary education level;

   b) Documented attainment of a secondary school diploma or its recognized equivalent;

   c) Secondary or postsecondary transcript or report card for a sufficient number of credit hours that shows a participant is meeting the state unit's academic standards;

   d) Satisfactory or better progress report, towards established milestones, such as completion of OJT or completion of one year of an apprenticeship program or similar milestones, from an employer or training provider who is providing training; or

   e) Successful passage of an exam that is required for a particular occupation or progress in attaining technical or occupational skills as evidenced by trade-related benchmarks such as knowledge-based exams.

6. Effectiveness in Serving Employers: WIOA Section 116(b)(2)(A)(i)(VI) requires the Departments to establish a primary indicator of performance for effectiveness in serving employers. This primary indicator of performance applies to all six core programs.

   The sole measure of effectiveness in serving employers is the percentage of participants in unsubsidized employment during the second quarter after exit from

the program who were employed by the same employer in the second and fourth quarters after exit.

## 6. Measurable Skill Gains (MSG)

The “Record MSG” button in the state MIS supports Measurable Skill Gains (MSG) to support federal reporting through the PIRL. Accordingly, it is important to provide local areas with state guidance on entering participant-related MSG data into the state MIS.

The MSG indicator calculates the number of participants who attain at least one type of gain during each period of participation within a given program year. Because this indicator is not exit based, each unique period of participation in an education or training program triggers inclusion in the calculation. Participants will achieve a successful outcome in the indicator as long as they attain one type of gain applicable to the core programs. Staff should record all MSG achieved by participants in a program year and report the most recent gain of each gain type, though only one gain is required per participation period per program year to meet performance outcomes.

Attainment of a gain is tied to achievement of a designated milestone. Milestones need to be established in advance of the education or training program, or in advance of the program year being measured, to be considered an “established milestone.”

### 6.1 Programs subject to MSG

Per Section 7-E of TEGL 10-16, Change 3, pages 21-22, participants who are in Title I-B Adult or Dislocated Worker-funded training, or training from a DOL partner program that shares a common exit with Title I-B Adult or Dislocated Worker, are subject to the MSG measure:

- Title I-B Adult and Dislocated Worker: All participants who are in a Title I-B Adult or Dislocated Worker-funded training program are included in the MSG indicator, which includes funding training programs for secondary school program equivalents and work-based training.

- Title I-B Youth: All In-School Youth (ISY) are included in the MSG indicator while they are attending secondary or postsecondary school. When in-school youth complete their secondary or postsecondary activities, they are removed from the MSG denominator in subsequent program years. If provided additional education and training services in subsequent program years, however, they are included in the MSG denominator for that program year.

  Only Out-of-School Youth (OSY) in one of the following program elements are included in the MSG indicator:
  - Occupational skills training
  - Education offered concurrently with workforce preparation
  - Secondary education during participation in the Title I-B Youth program

- Postsecondary education during participation in the Title I-B Youth program
- Title II-funded adult education during participation in the Title I-B Youth program
- Job Corps during participation in the Title I-B Youth program

- Trade Adjustment Assistance (TAA): Also, per TEGL 14-18 – Attachment 10, Page 2, the TAA program is subject to MSG as indicated in Appendix I, which is the same as MSG applied under WIOA.

Neither the Wagner-Peyser Act program nor Jobs for Veterans State Grant program are subject to MSG because while they are part of the state's common exit policy, neither provides training services to participants.

### 6.2 Documentation of MSG

TEGL 10-16, Change 3, directs that progress toward MSG can be documented by, among other methods, "secondary or postsecondary transcript or report card for a sufficient number of credit hours that shows a participant is meeting the State unit's academic standards. This is recorded in the Record MSG in the state MIS. To that end, the State has established the academic standard as a grade of "C" or higher as having met the academic standard for report cards.

The system includes all participants who are enrolled during program participation in a training or education program that leads to a recognized postsecondary credential, including a secondary education program in which individuals participate in a program year. To be counted in the numerator, an individual must obtain one of the positive progress benchmarks indicated by DOL in TEGL 10-16, Change 3, such as meeting a training milestone or other forms of progress towards credential or employment. The Record MSG button will allow staff to indicate which type of MSG progress a participant has made.

For documenting achievement of at least one educational functioning level (EFL), TEGL 10-16, Change 3, added at Section 4(b)(E)(1)(d), "educational functioning level gain for participants who pass a **subtest** on a State-recognized high school equivalency examination." This means countable EFL gains can be documented for any one of the four subject tests as opposed to only the overall composite EFL.

### 6.3 Differentiating between MSG and Credential Attainment

Completion of a course and passing an exam that is required to receive a license, degree, or occupational certificate would count as MSG, but the awarding of the license, degree, or occupational certificate itself would count as a Credential. The one exception to this guidance is a secondary school diploma or its equivalent, which counts as both a credential and an MSG, per TEGL 10-16, Change 3, pages 15 and 18.

While a participant is attending training there should be documentable progress of skills gained, or coursework completed, that would count as MSG. The attainment of a license,

degree or occupational certificate is seen as the end goal of training and those documents are considered credentials (page 15, TEGL 10-16, Change 3).

## 7. Credentials and Certificates

### 7.1 Recognized Postsecondary Credentials Counted Toward Federal Performance Measures

Postsecondary credentials reportable to DOL are described in TEGL 10-16, Change 3 and will be recorded in the state MIS, and in case files used for validation of federal reports.

The dates on which credentials, certificates or licenses are awarded need to be recorded in the "Record Credential" button in the state MIS. Dates are needed to determine the applicable timeframe for reporting. The following are acceptable types of credentials that count toward the credential attainment indicator:

- Secondary School diploma or recognized equivalent
- Associate degree
- Bachelor's degree
- Occupational licensure
- Occupational certificate, including Registered Apprenticeship and Career and Technical Education educational certificates
- Occupational certification
- Other recognized certificates of industry/occupational skills completion sufficient to qualify for entry-level or advancement in employment.

Note: WIOA Section 3(52) defines a recognized postsecondary credential as a credential consisting of an industry-recognized certificate or certification, a certificate of completion of an apprenticeship, a license recognized by the State or Federal Government, or an associate or baccalaureate degree. Graduate degrees are not included in the definition of a recognized postsecondary credential. Therefore, graduate degrees do not count towards credential attainment.

A variety of different public and private entities issue recognized postsecondary credentials. Below is a list of the types of organizations and institutions that award recognized postsecondary credentials (not all credentials by these entities meet the definition of recognized postsecondary credential).

A state educational 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 of 1965 (20 USC sec. 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 (FAFSA) programs;

- An institution of higher education that is formally controlled, or has been formally sanctioned or chartered, by the governing body of an Indian tribe or tribes.
- 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 product manufacturer or developer (e.g., recognized Microsoft Information Technology certificates, such as Microsoft Certified IT Professional (MCITP), Certified Novell Engineer, a Sun Certified Java Programmer, etc.) using a valid and reliable assessment of an individual's knowledge, skills and abilities;
- The DOL Employment and Training Administration's Office of Apprenticeship or a recognized State Apprenticeship Agency;
- A public regulatory agency, which awards a credential 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 license, or a State-licensed asbestos inspector);
- A program that has been approved by the Department of Veterans Affairs to offer education benefits to veterans and other eligible persons; or
- Job Corps, which issues certificates for completing career training programs that are based on industry skills standards and certification requirements.

Certificates awarded by local workforce development boards (LWDBs) and work readiness certificates are not included because neither type of certificate is recognized industry-wide, nor documents the measurable technical or industry/occupational skills necessary to gain employment or advancement within an occupation. Likewise, such certificates must recognize technical or industry/occupational skills for the specific industry/occupation rather than general skills related to safety, hygiene, etc., even if such general skills certificates are broadly required to qualify for entry-level employment or advancement in employment.

Note: Occupational skills licenses are granted by state licensing or regulatory bodies and are required as a condition of practicing a specific occupation. These must be industry-recognized, and include, but are not limited to:

- Commercial driver's licenses
- Nursing licenses
- Cosmetology licenses
- Massage licenses

For a list of occupations licensed by the Washington Department of Licensing, refer to http://www.dol.wa.gov/business/professionals.html. For a list of occupations licensed by the Washington Department of Health, refer to https://www.doh.wa.gov/licensespermitsandcertificates/professionsnewreneworupdate

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 Career and Technical Education Consortium of States (CTECS).
- 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, forklift operators, or other workers as a condition of performing work in an occupation.

### 7.2 Credentials That Do Not Count Toward Federal Primary Indicators of Performance

To be counted, certificates and credentials should be necessary to complete training and sufficient to perform 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 supplementary credentials do not normally indicate that one is qualified to perform the job. Credentials that do not count toward federal Primary Indicators of Performance 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 prevocational services
- Completion of programs provided by institutions and training organizations not licensed by WTECB or an equivalent state regulatory agency or trade association in cases where the institution or training provider is not eligible to provide recognized postsecondary credentials as described above.

Though these types of certificates do not count toward credential attainment, they may lead to positive outcomes in other performance indicators, so it may be valuable to provide services that lead to such certificates, depending on their contribution to the goals and outcomes articulated by participants or outlined in Individual Employment Plans (IEPs).