# PART E, CHAPTER 2:CREDENTIAL ATTAINMENT AND MEASURABLE SKILL GAINS

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| **Policy Number** | **Authority** | **Scope**  | **Effective Date** |
| Part E, Chapter 2 | [WIOA Section 116](https://rsa.ed.gov/sites/default/files/downloads/wioa.pdf), and 34 CFR [Subpart E](https://www.ecfr.gov/current/title-34/subtitle-B/chapter-III/part-361#subpart-E) | All TWC-VR staff, particularly the VR Counselor | 9/3/2024 |

## PURPOSE

In accordance with the authority (Federal and State) listed above, this policy is issued by the Texas Workforce Commission Vocational Rehabilitation Division (TWC-VR). Adherence to these rules and regulations issued under the Rehabilitation Act of 1973, as amended by Title IV of the Workforce Innovation and Opportunity Act (WIOA), supports Texans with disabilities in gaining, maintaining, and advancing in competitive integrated employment (CIE).

Specifically, the purpose of this policy and these procedures is to ensure adherence to providing the opportunity for TWC-VR customers to enroll in job-driven training programs, and the requirements for collecting and reporting credentials and measurable skill gains achieved.

## DEFINITIONS

There are no specific definitions for this policy and these procedures.

## POLICY

### General Overview

WIOA Section 116 Performance Accountability System establishes performance accountability indicators and reporting requirements to assess the effectiveness of States and local workforce development areas in achieving positive outcomes for individuals served by the workforce development system's six core programs.

The six core programs include the following:

1. Title I (U.S. Department of Labor)
	* Adult program
	* Dislocated Worker program
	* Youth program
2. Title II (U.S. Department of Education)
	* Adult Education and Family Literacy Act program
3. Title III (U.S. Department of Labor)
	* Wagner-Peyser Employment Service program
4. Title IV (U.S. Department of Education)
	* State Vocational Rehabilitation Services program (TWC-VR represents Title IV.)

The Credential Attainment (CA) Rate and the Measurable Skill Gains (MSG) Rate are two of the six performance indicators for which TWC-VR is accountable.

### Credential Attainment Rate

The percentage of those customers enrolled in an education or training program (excluding those in on-the-job [OJT] and customized training) who attained 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 customer who has attained a secondary school diploma or its recognized equivalent is included in the percentage of customers who have attained a secondary school diploma or its recognized equivalent only if the customer 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.

The following are acceptable types of credentials that count toward the credential attainment rate:

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

### Measurable Skill Gains (MSGs) Rate

The percentage of customers who, during a program year, are in an education or training program that leads to a recognized postsecondary credential or employment and who are achieving documented academic, technical, occupational, or other forms of progress, towards such a credential or employment.

MSGs are used to measure interim progress of customers who are enrolled in education or training services during a program year. It is intended to capture important progressions through pathways that offer different services based on program purposes and tailored to individual needs and goals.

Depending upon the type of education or training program in which a participant is enrolled, documented progress is defined as one of the following, and will count toward the MSG rate:

1. Documented achievement of at least one **educational functioning level (EFL)** of a participant who is receiving instruction below the postsecondary education level;
2. Documented attainment of a **secondary school diploma** **or its** **recognized equivalent**;
3. **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;
4. **Training Milestones:** 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
5. **Skills Progression:** 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.

### Exclusions from the Measures

There are specific customer exclusions from both the Credential Attainment and MSG Rates. These exclusions occur at the time of exit when the case is closed. These exclusions include the following:

* The customer exits TWC-VR because they have become incarcerated in a correctional institution or have become a resident of an institution or facility providing 24-hour support, such as a hospital or treatment center during the course of receiving TWC-VR services.
* The customer exits TWC-VR because of medical treatment expected to last longer than 90 days and precludes entry into unsubsidized employment or continued participation in TWC-VR.
* The customer is deceased.
* The customer exits TWC-VR because they are a member of the National Guard or other reserve military unit of the armed forces and are called to active duty for at least 90 days.
* The customer was determined eligible for TWC-VR services but is later determined not to have met the eligibility criteria.

### Training and Education Programs that Do NOT Lead to a Credential or MSG

Certificates must recognize technical or industry/occupational skills for the specific industry or occupation rather than general skills related to safety, hygiene, etc. (e.g., social skills training, CPR, OSHA) even if such general skills certificates are broadly required to qualify for entry-level employment or advancement in employment.

Although these types of certificates do not contribute towards the indicators, they may increase the customer’s ability to obtain, maintain, and advance in employment. TWC-VR may determine it valuable to provide services for these type of training programs in an Individualized Plan for Employment (IPE).

Typically, 18+ high school and pre-employment transition services (Pre-ETS) do not result in a recognized credential or MSG. These services are exploratory in nature and may not be directly related to the skills (i.e., academic, technical, occupational) required for the employment goal. VR Counselors are encouraged to consult with their management team when questions regarding these programs arise.

## PROCEDURES

### Providing Education and Training Opportunities

VR Counselors hold a fundamental responsibility to advise on opportunities for job-driven training programs to customers of TWC-VR. Education and training programs aim to equip students with the necessary skills and abilities to secure gainful employment. By providing job-driven training services, TWC-VR ensures that customers are prepared to meet the demands of the workforce and contribute meaningfully to society.

Education and training not only enhance the employability of customers, but also promotes their independence, self-sufficiency, and long-term labor attachment.

VR Counselors must document all opportunities for education and training, the supports TWC-VR provides or coordinates to assist the customer in succeeding, and the outcome of the training.

### Determining an Education or Training Program that Leads to a Recognized Credential or Employment

TWC-VR staff must determine whether or not the training or education program listed in the customer's IPE meets the definition of a recognized credential or MSG. TWC-VR provides a variety of training opportunities that do not lead to a recognized credential (e.g., social skills training, CPR, OSHA), but are determined to be a need for the customer and are included in their IPE.

* Secondary Credentials: Secondary school diploma or alternate diploma is one that is recognized by a State and is included for accountability purposes under Every Student Succeeds Act (ESSA). A secondary school equivalency certification signifies that a student has completed the requirements for a high school education. The State may recognize other types of recognized equivalents. Examples include the following:
	+ Obtaining certification of passing scores on a State-recognized high school equivalency test (HSET);
	+ Earning a secondary school diploma or State-recognized equivalent through a credit-bearing secondary education program sanctioned by State law, code, or regulation;
	+ Obtaining certification of passing a State-recognized competency-based assessment; and
	+ Completion of a specified number of college credits.
* Postsecondary Credentials: A recognized credential awarded in recognition of the customer's attainment of measurable technical or industry/occupational skills necessary to obtain employment or advance within an industry/occupation. These technical or industry/occupational skills generally are based on standards developed or endorsed by employers or industry associations.

A recognized postsecondary credential consists of an industry-recognized certificate or certification, a certificate of completion of an apprenticeship, a license recognized by the State involved or Federal government, or an associate or baccalaureate degree or graduate degree.

The following are types of organizations and institutions that award recognized postsecondary credentials. Not all credentials offered by these entities meet the definition of a recognized postsecondary credential.

* + A State educational agency or a State agency responsible for administering vocational and technical education;
	+ An institution of higher education that is qualified to participate in the student financial assistance programs authorized by title IV of the Higher Education 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;
	+ 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, National Institute for Metalworking Skills) or product manufacturer or developer (e.g., recognized Microsoft Information Technology certificates, such as Microsoft Certified Solutions Expert [MCSE], Oracle Certified Professional [Java developers]) using a valid and reliable assessment of an individual’s knowledge, skills and abilities;
	+ The Employment and Training Administration’s (ETA) Office of Apprenticeship or TWC Office of Apprenticeship;
	+ A public regulatory agency, which awards a credential upon an individual’s fulfillment of educational, work experience, or skill requirements legally necessary for the individual to use an occupational or professional title or to practice within an occupation or profession (e.g., [Texas Department of Licensing and Regulation (TDLR)](https://www.texas.gov/occupational-professional-licenses-in-texas/);
	+ A program that has been approved by the Department of Veterans Affairs to offer educational benefits to veterans and other eligible persons; and
	+ ETA’s Job Corps program, which issues certificates for completing career training programs that are based on industry skills standards and certification requirements.
* MSGs: Training programs that provide academic, technical, occupational, or other forms of progress that do not lead to a recognized credential may lead to employment. Typically, these training programs teach specific skills for the customer’s employment goal and are provided by an employer or other training provider.

On-the-Job Training (OJT) and Customized Training are examples of training programs that do not lead to a credential; however, because they are industry-specific, they teach technical and occupational skills on the job that lead to employment and therefore result in an MSG.

### Supporting Documentation Required for Data Validation

TWC-VR must obtain supporting documentation to validate the achievement of credentials and MSGs reported in ReHabWorks (RHW). Once the education or training program has been included in the IPE and determined to lead to a recognized credential or employment, TWC-VR staff must document the date of program enrollment, the achievement of MSGs, and the completion of the program (e.g., credential attained, withdraws).

* Enrollment: The date of program enrollment must include supporting documentation. Depending upon the type of training or education program, the supporting documentation may vary. Examples of allowable supporting documentation for enrollment include, but are not limited to, the following:
	+ Copy of enrollment record
	+ Registration forms or other attendance records
	+ Transcripts or Report Cards
	+ Notes from program staff
* Credentials: The following table includes the types and examples of recognized credentials and allowable supporting documentation.

TWC-VR staff must make at least three attempts to obtain supporting documentation that validates the credential attainment from third-party education and training providers before utilizing case notes as the supporting document. See table below.

Case notes documenting information obtained from education or training provider must include at a minimum the following:

* + A participant's status for a specific credential;
	+ The date on which the information was obtained;
	+ The staff member who obtained the information; and
	+ Justification for not obtaining formal documentation.

| Credential | Examples | Supporting Documentation |
| --- | --- | --- |
| **Secondary School Diploma** | * High School Diploma
 | * Copy of High School Diploma
 |
| **Secondary School Equivalency** | * GED
* HSEP
 | * Copy of GED
 |
| **Associate degree** | * AS General Education
* AS Computer Sciences
 | * Copy of the degree/
* Transcripts that show the degree awarded
 |
| **Bachelor’s degree** | * BS Social Work
* BS Graphic Design
 | * Copy of the degree
* Transcripts that show the degree awarded
 |
| **Graduate degree** | * MS Rehabilitation Counseling
* MS Business Administration
 | * Copy of the degree/
* Transcripts that show the degree awarded
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| **Occupational License** | * Registered Nurse License
* Behavior Analyst License
* Business Enterprise of Texas (BET)
 | * Copy of license
 |
| **Occupational Certificate/Certification** | * CompTIA A+ Certification
* HVAC Certification
* Plumbers Registered Apprenticeship Certification
 | * RA Certification
* Copy of certification
* School records that show the certification
 |

* MSGs: The following table includes the types of MSGs and examples of allowable supporting documentation. Case notes are not considered allowable supporting documentation for MSGs.

| MSG Requirements | Supporting Documentation Examples |
| --- | --- |
| **EFL:** Advancement of an educational level by making measurable improvement in educational attainment as measured by—* A pre-test and post-test (e.g., TABE, BEST Plus);
* Awarding credits or units through an adult high school transcript; or
* Enrollment in a postsecondary education or training program after completion of a secondary school program.
 | * Copy of a pre- and post-test showing an improvement in functioning level
* Copy of adult education transcript or report card showing credits or units awarded
* Postsecondary education or training enrollment determined through data match, survey documentation, or program notes
 |
| **Secondary School Diploma or Recognized Equivalent:** Graduating from high school or obtaining a GED/HSEP.  | * Copy of a high school transcript showing achievement of the diploma
* Copy of the secondary school diploma
* Copy of the GED
 |
| **Secondary/Postsecondary Transcript or Report Card**:* Secondary: Successful completion of a semester in a secondary school program. Report card shows that the student has successfully passed all courses. "Passing" refers to the minimum grade required to receive credit hours for completion of a course. If the report card indicates the participant dropped out of school, was removed from the institution, or any other conditions that indicate removal on academic or conduct grounds, then an MSG was not achieved.
* Postsecondary:
* Full-time students must complete at least 12 hours/credits for one semester.
* Part-time students must complete at least 12 hours/credits over the course of two completed semesters during a 12-month period. For part-time students, the MSG occurs and is documented in RHW when the 12th credit hour is obtained.
* Other recognized education programs in which the customer is enrolled include, but are not limited to, semesters, trimesters, quarters, and clock hours for the calculation of credit hours when they achieve the equivalent of this MSG. (e.g. Graduate school full-time status is nine credit hours per semester).
 | * Copy of secondary report card for one semester showing passing grades
* Copy of secondary school diploma that was achieved by passing the final semester
* Copy of a postsecondary transcript that shows 12 credits achieved in one semester
* Copy of a postsecondary transcript that shows six credits earned during the Fall semester and six credits earned during the following Spring semester
* Passing grades for completing one module of a training program (e.g., cosmetology, barbering)

An accompanying academic calendar may be required to verify MSG date. |
| **Training Milestone:** Satisfactory or better progress report towards established milestones, such as completion of OJT, Customized Training or completion of established milestones in an apprenticeship program or similar milestones from an employer or training provider who is providing training.  | * Copy of satisfactory completion of a training period for OJT or Registered Apprenticeship
* Progress reports or evaluations from an employer or training provider documenting satisfactory or better progress toward established milestones
* Verification of the completion of a Project Search Internship
 |
| **Skills Progression:** Successfully passing an exam that is required for an occupation or progress in attaining technical or occupational skills. | * Results of a knowledge-based exam
* Documentation from the employer or training provider
* Copy of a credential that is required for a particular occupation and is only earned after the passage of an exam (i.e., license or certification)
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### Documenting Credentials and MSGs

Credentials and MSGs are captured in RHW through various pages, including the Education History page, the Training Information page, and the Semester/Grading Period page. These pages need to be regularly updated after the completion of each semester or grading period/milestone, if a customer withdraws from the training program (for any reason), and when the training is completed (i.e., credential achieved). Timely, valid, and accurate data is required for the performance indicator calculations for TWC-VR.

* Enrollment: Once the customer enrolls in a training or education program, the "date registered" must be documented in RHW and include supporting documentation.

If the customer was already enrolled in a training or education program at the time of the initial IPE, the "date registered" is the date of the IPE. Supporting documentation must show that the customer was enrolled prior to/at the time of IPE.

For customers who enroll in a training or education program any time after the IPE date, the "date registered" should reflect the actual date of program enrollment.

* Credentials: Once the customer successfully completes the training or education program and receives supporting documentation of that achievement, TWC-VR staff must—
	+ Enter the graduation/completion/achieved date displayed on the supporting documentation in the training record in RHW; and
	+ File supporting documentation in the case file.

If the customer obtains an occupational license or certification after completion of a training or education program, TWC-VR staff must—

* + Enter the occupational exam passed date displayed on the source documentation in the training record in RHW; and
	+ File supporting documentation in the case file.

Copies of supporting documentation must be obtained from the customer as soon as the credential is achieved but no later than the Joint Annual Review, when RHW is updated. Electronic documents are acceptable but must be printed and maintained in the customer's case file. Multiple documents to show proof of credential (e.g., diploma, case notes) are preferred but not required.

* MSGs: Once the customer successfully makes interim progress in the training or education program and receives supporting documentation of that achievement, TWC-VR staff must—
	+ Enter the MSG type achieved in the training record in RHW; and
	+ File supporting documentation in the case file.

An MSG is captured in RHW when TWC-VR staff enter an end date when an MSG is achieved. The start and end dates in RHW must match the start and end dates on the supporting documentation. If there are no dates on the supporting documentation (e.g., the screenshot of the final grades has no end date, the transcript doesn’t include semester dates), then the start and end dates of the semester/grading period noted on the training institution’s academic calendar is used in RHW. A copy of the calendar must be included with the supporting documentation in the case file.

Copies of supporting documentation must be obtained from the customer as soon as the documentation becomes available at the end of the semester or grading period. TWC-VR staff must attempt to contact the customer to obtain the required documents for the type of MSG within eight weeks of the end of the semester or grading period, but no later than the start of the next semester or grading period.

Electronic documents are acceptable and must be maintained in the customer's case record. Multiple documents to show proof of the MSG (e.g., report card, case notes) are preferred but not required.

### Case Notes

TWC-VR staff must document specific details about the customer's progress and the reason for the update to the Education History page in case notes. Progress, challenges, service provision(s), employment or educational goal status, and informed choice, etc., should be clearly described when continuing to support a customer in training, and to explain why or why not credentials and MSGs were achieved or not achieved by the participant.

## APPROVALS & CONSULTATIONS

There are no approvals or consultations for this policy and these procedures.

**REVIEW**

The Policy Planning and Statewide Initiatives Team, or designee, is responsible for reviewing this policy and these procedures and will update the Document History log if necessary.

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| **Date** | **Type** | **Change Description** |
| 9/3/2024 | New | VRSM Policy and Procedure Rewrite |