Credential Attainment Guide for State VR Agencies

State Vocational Rehabilitation Agencies (SVRAs) are continuing robust efforts to implement the required changes to the Vocational Rehabilitation (VR) program authorized under Title I of the Rehabilitation Act of 1973, as amended by WIOA Title IV and administered by the U.S. Department of Education (ED). The purpose of this WINTAC guide is to provide technical assistance to SVRAs to understand the requirements of recognized education and training programs related to the Credential Attainment Indicator, and to develop policies and procedures for using Federal joint guidance.

Federal Joint Guidance

**RSA-TAC-17-01 Performance Accountability Guidance for Workforce Innovation and Opportunity Act (WIOA) Title I, Title II, Title III and Title IV Core Programs**: The purpose of this guidance is to provide sub-regulatory guidance on the requirements set forth in WIOA, related to the implementation and operation of the performance accountability system under section 116 of WIOA and the implementing regulations in 34 CFR parts 361 subpart E.

**Credential Attainment** is the percentage of those participants enrolled in an education or training program (excluding those in 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 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.

With thousands of postsecondary training programs across the country, how do SVRAs determine whether or not they meet the definition of a recognized education program leading toward a credential, for purposes of WIOA performance?

ED and the U.S. Department of Labor do not specify which credentials count toward the Credential Attainment Indicator. SVRAs must use the Federal joint guidance to determine whether a specific credential counts toward the Credential Attainment Indicator. Using the Federal joint guidance, the WINTAC has outlined questions a SVRA would need to answer, provided some credential examples and highlighted other considerations.
Recognized Postsecondary Credentials

A Recognized Postsecondary Credential is defined as a credential consisting 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, as well as graduate degrees for purposes of the VR program as required by section 103(a)(5) of the Rehabilitation Act of 1973, as amended by Title IV of WIOA. A recognized postsecondary credential is awarded in recognition of an individual’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.

SVRAs often struggle with the difference between an allowable training service under an Individualized Plan for Employment (IPE) versus an education or training program that meets the definition of a recognized education program under WIOA for the Credential Attainment Indicator. SVRAs must train staff on their policies related to credentials and how to document these in the case management system accurately. One example might be a Comprehensive Transition Program, such as Think College, which may or may not result in the student earning a recognized postsecondary credential. Like all VR services, SVRAs should consider the needs of the individual when considering education and training programs for VR participants.

Don’t Forget!

🌟 Special Rule for Students in Secondary Education/Recognized Equivalents: 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.

🌟 Recognized Education Programs Leading Toward a Credential: Similar to all services reported in the RSA-911, a recognized education or training program needs to be included on the IPE in order to document the credential earned, including Secondary School Diploma or Recognized Equivalent.

🌟 SVRAs need to create their own policies and procedures: VR Counselors need to understand their SVRAs process in determining allowable recognized education and training programs and how to maintain supporting documentation for the credential attained.

🌟 Aligning with WIOA Core Programs: Though it is not required to align all WIOA policies, SVRAs may benefit from partnering with other WIOA core programs on policies/procedures and supporting documentation requirements for the Credential Attainment Indicator.

🌟 General Skill Certificates Do Not Meet the Definition of a Credential: 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.
Credential Checklist

SVRAs may use the following checklist as a guide to determine if a specific education or training program meets the definition of recognized education program leading toward a postsecondary credential or secondary school credential, as defined by WIOA. This checklist is intended for use only as a guide, using the RSA TAC-17-01. SVRAs are encouraged to create state-specific guidance that, when possible, aligns with the other State agencies implementing WIOA core programs.

Answering “YES” to all of these questions provides reasonable assurance that the education or training program results in a recognized postsecondary or secondary credential and can be documented and included in the Credential Attainment indicator.

Postsecondary Credentials

Is the training program offered by one of these types of organizations and institutions that award postsecondary credentials?

<table>
<thead>
<tr>
<th>State Agency</th>
<th>Institute of Higher Education</th>
<th>Indian Tribe</th>
<th>Industry/Employer Organization</th>
<th>Apprenticeship Agency</th>
<th>Regulatory Agency</th>
<th>Veterans Affairs</th>
<th>Job Corps</th>
</tr>
</thead>
</table>

Is the credential one of the WIOA types of acceptable credentials?

<table>
<thead>
<tr>
<th>Secondary School Diploma/Equivalent</th>
<th>Associate Degree</th>
<th>Bachelor Degree</th>
<th>Graduate Degree (VR)</th>
<th>*Occupational Licensure/Certificate</th>
<th>*Occupational Certification</th>
<th>Other Industry/Occupational</th>
</tr>
</thead>
</table>

Have you verified the credential results in industry-wide, measurable technical or industry/occupational skills, rather than general skills certificate examples below, that DO NOT count?

<table>
<thead>
<tr>
<th>*General Computer/security</th>
<th>*Good safety practices</th>
<th>*Good hygiene practices</th>
<th>Workforce Development Boards/work readiness certificates</th>
<th>*VR Training &amp; Comprehensive Rehab Centers</th>
</tr>
</thead>
</table>

Are you confident that the training is not excluded from the indicator?

<table>
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<tr>
<th>*On-the-Job-Training</th>
<th>Customized Training</th>
</tr>
</thead>
</table>
Credential Checklist Continued

Secondary Credentials – Diplomas or Equivalents

Is the secondary school diploma ...

- Recognized by a State, AND; *Included under the Elementary and Secondary Education Act (ESEA)/ Every Student Succeeds Act (ESSA)

Is the secondary school equivalency certification ...

- Recognized by a State, AND; Signifies that requirements for high school education have been completed

Is the secondary diploma, alternative diploma and/or recognized equivalent shown by one of the following examples?

| Equivalency exam with passing scores | Diploma or state-recognized equivalent (credit bearing) | *Passing competency based exam/assessment | *College credit |

Can you verify that the secondary education program is NOT ...

- *Special Education - Certificate of Completion through IDEA
- Other certificates/diplomas of completion or attendance, not credit bearing and consistent with state academic standards

*See pages 5-6 for specific examples.
Data Validation

SVRAs must follow Guidance for Validating Jointly Required Performance Data Submitted under the Workforce Innovation and Opportunity Act (WIOA), outlined in TAC-19-01, as they maintain supporting documentation for the MSGs that VR program participants may earn.

Specific Examples

SVRAs may use the following examples for training, comparing programs and determining other types of secondary and postsecondary credentials.

Credential Examples that DO count

- **Occupational License**
  - Cosmetology/Barbering License
  - Certified Nursing Assistant (CNA) License
  - Certified Public Accountant (CPA) License
  - Business Enterprise Program (BEP)

- **Occupational Certificates/Certifications**
  - Registered Apprenticeship Occupational Certificates
  - Career and Technical Education (CTE)/Job Corps Certificates
  - Microsoft Certified IT Professional (MCITP)
  - Certified Welder or Automotive Service Excellence (ASE)

- **ESEA/ESSA**
  - Every Student Succeeds Act High School Graduation Rate
  - Non-regulatory Guidance (Resource for ESEA/ESSA)

- **College Credit**
  - Community college high school completion programs
  - Adult education completion

- **Pass competency-based exam and/or assessment**
  - State recognized high school equivalency exam
  - General Education Development
Specific Examples (continued)

SVRAs may use the following examples for training, comparing programs and determining other types of secondary and postsecondary credentials.

 Credential Examples that DO NOT count

<table>
<thead>
<tr>
<th>Category</th>
<th>Examples</th>
</tr>
</thead>
<tbody>
<tr>
<td>General computer and security</td>
<td>• Microsoft Office Specialist (proficiency in word, PPT, Excel)</td>
</tr>
<tr>
<td></td>
<td>• General computer/network security certificates</td>
</tr>
<tr>
<td>Good safety practices</td>
<td>• Occupational Safety and Health Administration (OSHA)10</td>
</tr>
<tr>
<td></td>
<td>• MSHA – Mine Safety and Health Administration</td>
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<tr>
<td></td>
<td>• Industry-specific safety certificate (e.g., construction or transportation)</td>
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<tr>
<td>Good hygiene and health practices</td>
<td>• ServSafe Food Handlers Certification</td>
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<td></td>
<td>• Food Safety Manager and Training Certifications</td>
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<td></td>
<td>• First Aid, CPR, other general health practice Certifications</td>
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<tr>
<td>On-the-Job Training &amp; Customized Training</td>
<td>• Agency-sponsored OJT with a specific employer</td>
</tr>
<tr>
<td></td>
<td>• Employer driven training programs (e.g., CVS, Walgreens, Sephora)</td>
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<tr>
<td>Workforce Development Boards (WDBs)</td>
<td>• Work and Career Readiness Certificates</td>
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<tr>
<td></td>
<td>• Other general training certificates (e.g., Resume Building)</td>
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<tr>
<td>VR Training &amp; Comprehensive Rehab Centers</td>
<td>• SVRAs should evaluate education and training programs offered by Comprehensive Rehabilitation Centers, that prepare individuals with disabilities for employment, on a case by case basis. While social skills training, work adjustment, and work readiness training programs that result in a certificate of completion would not meet the definition of a recognized postsecondary credential under WIOA, other vocational training programs (e.g., cosmetology license) offered by such Centers may meet the definition.</td>
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<td></td>
<td>• Completion of Orientation and Mobility Training</td>
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<tr>
<td>Comprehensive Transition Programs</td>
<td>• When a student completes a Comprehensive Transition Program, like Think College, he or she may or may not earn a recognized postsecondary credential that meets the definition of a credential. Therefore, SVRAs should review each student’s participation in such programs on a case-by-case basis.</td>
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