

COMMON MEASURES Q & A

1) **Question:** A community college's Workforce Training Center (WTC) offers courses that issue certificates upon course completion. Although issued through the community college, however, the WTC does not accept financial aid for the instruction of these courses. Taking that into account, would the certificate issued by the institution still be considered valid under the new definition of "certificate" under common measures?

Answer: Yes. During training, staff presented this question after looking at the definition of certificate-awarding entities, focusing on the definition of institutions qualified to participate in the federal student financial aid programs. Staff were under the impression that because the WTC could not accept federal financial aid, these certificates would not fall under the measure. However, the TEGL definition states that a certificate may be awarded by "an institution of higher education...that is qualified to participate in student financial assistance programs..." including community colleges. The definition applies to the certificate-awarding entity, in this case, the community college which is eligible to participate in financial assistance programs, and not the course itself. The WTC is an extension of the community college, and would fall under its jurisdiction regardless of whether it accepts financial aid or not.

A certificate issued in this manner would be in compliance with the new common measures definitions. However, as stated in TEGL 17-05, any certificate awarded should be in recognition of attainment of a measurable technical or occupation skill necessary to gain employment or advance within an occupation. Staff are not encouraged to enroll participants in courses that may issue certificates but do not meet the intent of TEGL 17-05.

2) **Question:** Several youth providers have programs that incorporate First Aid/CPR training into them and as a result of successfully completing the training, a participating youth receives an American Red Cross certificate in First Aid or CPR. However, the instructor's affiliation is with American Red Cross, and may not have any affiliation with an educational institution.

Based on this, would attainment of this certificate be counted towards the Attainment of a Degree or Certificate measure?

Answer: Yes, assuming the participant was enrolled in education at enrollment or at any point during participation in WIA.

A First Aid or CPR certificate is considered a nationally recognized certificate issued as a result of participating in a nationally recognized curriculum that provides technical and occupational skills. Additionally, American Red Cross is considered "A professional...organization...using a valid and reliable

assessment of an individual's knowledge, skills, and abilities" under TEGL 17-05's definition of certificate.

- 3) **Question:** If a high school issues a certificate of completion of secondary education for a student who is unable to pass state achievement tests or their alternatives for attainment of a high school diploma, can this be claimed as a "certificate" as defined under the new common measures?

Answer: No. A certificate of completion is not an academic certificate or credential, such as a diploma. Certificates of completion are given to acknowledge participation/attendance of a student, and are usually given to students with Individualized Education Plans (IEPs), foreign exchange students and other pupils who have not earned the number of credits necessary to meet state graduation requirements. Most school districts will permit students receiving certificates of completion to participate in graduation ceremonies with their class. However, it is important to note that certificates of completion would not prohibit the recipient from finishing his or her high school education or the equivalent at a later date.

Issue: Information presented in USDOL's online Common Measures Training, and subsequently passed along during statewide Common Measures training with providers (via the Literacy & Numeracy TAG), indicated that if an out of school basic-skills deficient youth re-enters school during the first year of participation, the youth is not subject to the Literacy and Numeracy measure in the second year of program participation. However, this guidance does not appear anywhere in TEGL 28-04 or in TEGL 17-05. When clarification was sought with USDOL staff, our federal representatives expressed some concern regarding the information contained in the online training and reviewed the matter.

After a lengthy period of review, USDOL responded that the information presented in the online training and subsequent state Common Measures training was incorrect. An out-of-school youth who re-enrolls in school in their first year of program participation is still subject to the Literacy & Numeracy measure if 1) they are still basic skills deficient after the first year and 2) they complete their second year in the WIA program. We apologize for the confusion; we are asking staff who attended the Common Measures training in June of 2006 to replace the Literacy and Numeracy TAG they received during the training with the version currently in the WIA-MIS.

- 4) **Question:** If prior to enrolling a youth, a case manager administers the TABE Locator and determines there is a deficiency in only one area, math for example, would the ABE office administer the entire TABE Battery/Survey to the youth or would they only apply the section of the Battery/Survey where there is a deficiency?

Answer: This question was posed to the state director of ABE to which she responded:

“If the student completes the locator and only wants to work in the area of math, and this is the only area where he/she will receive instruction, it would be appropriate to give him/her the locator and only the math portion of the TABE. If the student is working on his/her GED and you aren't sure of the skills level, it's best to give the whole battery, or at least the reading and math portion of the full battery. It is a long test and we've had many discussions about how this might effect our population and discourage them from continuing, but this has not been the case. The better the upfront assessment and plan, the more likely the right connections will be made to hold onto the student. “

Staff should be aware that ABE offices will not charge for youth testing services if the purpose of testing is followed by ABE remediation. If ABE will not be providing remediation for the youth, then local ABE offices will need to charge for testing. ABE is not permitted to use their funds to provide assessment to students enrolled in school since they are not eligible for ABE services.

It is recommended that providers who will be using ABE offices for testing purposes only contact their local ABE offices to set up arrangements for the testing of those students who will not be remediated by ABE.

- 6) **Question:** If results of the TABE Locator indicates an individual is basic skills deficient at enrollment and subsequent to enrollment, the results of the TABE full battery indicate the youth is not basic skills deficient:
- a) Is the participant still eligible for the program if basic skills deficiency was selected as the Additional Eligibility Requirement?
 - b) How does the change affect the Literacy/Numeracy measure?

Answer:

- a. Yes, the participant is still eligible for the program. Unless purposefully fraudulent, eligibility is based upon information collected during the application process. Testing information collected subsequent to enrollment will not affect eligibility. If fraud is involved on the part of the participant, the participant may be considered ineligible for the program and all costs would be disallowed.
- b. The youth would not be included as part of the Literacy/Numeracy measure since the TABE battery results would show no deficiencies in any of the areas tested. However if this occurs, case managers **must** contact Jerry Riley in order to determine if the participant's permanent record needs to be updated as a result of the assessment's outcome.

The programmer would update the Basic Skills Deficient field as appropriate in the Characteristics-1 screen in the permanent record. Another factor that may come into play when changing the basic skills deficiency field for youth in the MIS is the funding stream (other or out-of-school youth.)

- 7) **Question:** How are incentives to be offered to participants?
- a) One award per program year or calendar year?
 - b) \$50 per test once GED is attained or only \$50 once GED is attained, and nothing more for taking the tests?

Answer:

- a) A participant may actually receive incentives from a combination of the approved incentive groups, if appropriate.
 - b) \$50 for each GED section passed during participation in the WIA Youth program and will receive the accumulated incentive once competency is attained. This incentive does not apply towards the passing of a high school equivalency test. The costs associated with testing, however, will be covered if the test is **required**, beyond a GED, for employment.
- 8) **Question:** Would you please clarify “*enrolled in education?*”

Answer: In order to be included in the “Attainment of a Degree or Certificate” Common Measure, the WIA participant must be enrolled in education at participation, or at any point during the program. The field on the WIA Management Information System that impacts this measure is the “**Enrolled in Education: (Youth Only)**” field located on the Characteristics-1 screen. If the Characteristics-1 screen indicated the participant enrolled in education, the participant would be included in this measure.

This is one of the few fields in the WIA MIS that is ‘real time,’ meaning that ANY TIME this field changes, it affects whether the participant will be included or excluded from the measure.

If a participant were **NOT** enrolled in education at participation (enrollment) but DID enroll subsequent to participation (and prior to exit), case managers should update the Enrolled in Education field to indicate the participant enrolled in school. If the youth decides not to continue with education while participating in the program, *and once a change has been made from out of school to in school, do not change this field back to out-of-school.*

- 9) **Question:** If a case manager inadvertently neglects to indicate in the WIA MIS that a youth *enrolled in education*, and the case manager claims attainment of a degree or certificate, will the case manager be notified of the discrepancy?

Answer: Yes, there is an edit in the exit screen that alerts the case manager when there is a discrepancy between claiming a degree or certificate by the end of the third quarter after exit and what is entered in the “*enrolled in education*” field on the Characteristics-1 screen. Additionally, the USDOL contractor also has an edit in their software program that identifies discrepancies. Jerry Riley will in turn request that case managers address the discrepancy.