

Summary of Comments & Responses: Chapter 11.5.7 Credential Attainment Rate

Policy Effective February 26, 2019

1. A commenter pointed out that the revised policy removed the positive performance incentive that had been gained by co-enrollment.

Co-enrollment and related practices of "blending" and "braiding" fund sources are still encouraged by DOL and DWD. Given the clarifying guidance from DOL regarding which participants are included in the credential attainment rate/measurable skill gain indicator for Adult and Dislocated Worker programs, the "positive performance incentive" of receiving credit for a credential/measurable skill gain from a participant receiving training funded by a non-common exit program fund source is replaced with the reduction of risk associated with co-enrollment of participants who are in a training program funded by a program not in Wisconsin's common exit policy and do not attain a credential or measurable skill gain. The clarifying guidance is risk averse opposed to performance boosting for the Title I and TAA programs. DWD-DET programs are designed with the intention that multiple fund sources should be able to take "credit or accountability" in supporting an individual participant's ability to meet educational attainment standards as defined by the performance indicators.

2. Several commenters asked if specific certificates were considered credentials and certain exams were considered measurable skill gains.

The comments are out of scope for the policy. The comments have been forwarded to the Credential Attainment Rate Workgroup at wisperforms@dwd.wisconsin.gov. Wisconsin's WIOA core programs and TAA established a workgroup to assist in determining what constitute a credential and measurable skill gains.

3. A commenter wanted to confirm whether a participant who received both On-The-Job training and an occupational classroom training still counted in the credential attainment rate denominator.

Yes, On-the-Job Training and Customized Training services alone do not include the participant in the Credential Attainment Rate for the WIOA Title I Adult, Dislocated Worker and Trade Adjustment Assistance Act programs. However, DWD-DET notes that On-the-Job Training and Customized Training do not exclude participants from the Credential Attainment Rate when another qualifying form of training is received such as occupational classroom training.

4. A commenter requested further clarification of two statements that explained the relationship between training services and fund sources and the inclusion into the Credential Attainment Rate and Measurable Skill Gain indicators.

DWD-DET modified the language to ensure the list referenced was clear to the reader.

Summary of Comments & Responses: Chapter 11.5.8 Measurable Skill Gain

Policy Effective February 26, 2019

1. A commenter requested clarification on whether Title I staff are responsible for entering and tracking credential and measurable skill gain information even if Title I services are closed.

The comment is out of scope for this policy since it intends to change operating procedures. Title I and Trade Adjustment Assistance (TAA) share responsibility for entering credential/measurable skill gain documentation as both programs are held to the same performance indicators and may share reported information. The comment was forwarded to the appropriate program area(s) for consideration.

2. A commenter inquired whether a previously entered measurable skill gain, not funded by a WIOA fund source, would still count in the performance indicators.

If a participant still qualifies for the Measurable Skill Gain indicator due to having at least one training service funded by the WIOA Title I Adult, Dislocated Worker or Trade Adjustment Assistance program, the participant and the Measurable Skill Gain will be counted in the performance indicators. If the participant did not receive at least one training service funded by the WIOA Title I Adult, Dislocated Worker or Trade Adjustment Assistance program, the participant will not be included in the indicator nor does the participant receive a Measurable Skill Gain. Furthermore, there is not any federal restrictions that reported credentials and measurable skill gains must be earned using funding from WIOA Title I Adult, Dislocated Worker, Youth, National Dislocated Worker Grants, or Trade Adjustment Assistance Act fund sources. The federal clarifications and revisions only address the inclusion of participants in the Credential Attainment Rate and Measurable Skill Gain indicator denominators.