ADVISORY: **TRAINING AND EMPLOYMENT GUIDANCE LETTER NO. 35-12, Change 1**

TO: STATE WORKFORCE AGENCIES
STATE WORKFORCE LIAISONS
STATE WORKFORCE ADMINISTRATORS
STATE AND LOCAL WORKFORCE DEVELOPMENT BOARDS
ALL YOUTHBUILD GRANTEES

FROM: BYRON ZUIDEMA /s/
Deputy Assistant Secretary

SUBJECT: Clarification on Definition and Guidance of Allowable Construction
Credentials for YouthBuild Programs

1. Purpose. To provide further clarification of the Employment and Training Administration's (ETA) definition of the term credential for national YouthBuild program grantees as well as additional guidance on commonly used construction credentials for YouthBuild participants.

2. References.
- Workforce Innovation and Opportunity Act (PL 113-128 July 2014),
  https://www.gpo.gov/fdsys/pkg/PLAW-113publ128/pdf/PLAW-113publ128.pdf
- Training and Employment Guidance Letter (TEGL) No. 10-16, "Performance Accountability Guidance for Workforce Innovation and Opportunity Act (WIOA) Title I, Title II, Title III and Title IV Core Programs,"
  https://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=8226
- National Center for Construction Education and Research (NCCER) Web site:
  https://www.nccer.org/
- Home Builders Institute's Pre-Apprenticeship Certificate Training (HBI-PACT) Web site: http://www.hbi.org/Programs/PreApprenticeship/HBIPACT
- North America's Building Trades Unions' Building Trades Multi-Craft Core Curriculum (MC3) Web site: https://nabtu.org/multi-craft-core-curriculum/
- Building Performance Institute, Inc. (BPI) Web site: http://www.bpi.org/home_pros.aspx

3. Background. The Workforce Innovation and Opportunity Act (WIOA) reflects a continued emphasis on job training and the attainment of industry-recognized credentials. Credential attainment can assist youth and adults in leveraging new skills to build lasting careers, enhance talent pipelines, and help to ensure employment security as they compete in today's labor market. The attainment of a degree or credential is also one of the YouthBuild program's required WIOA performance indicators. The purpose of this guidance is to provide updated

RESCISSIONS	EXPIRATION DATE
None	Continuing

information on the credential measure under WIOA and to provide a clarification to one of the three commonly used construction credentials described in TEGL 35-12, as well as to include a fourth commonly used construction credential, all of which meet the WIOA definition and are appropriate for reporting in the YouthBuild Web-based Management Information System (MIS).

4. Credential Definition. Within this guidance, the term credential includes certificates, degrees, certifications, and licenses. As defined in TEGL 10-16, credentials are categorized as either postsecondary credentials or secondary school diplomas. Because there are so many different types of credentials, it is not the Department's practice to determine whether specific credentials count under the degree/certificate attainment rate. The information below provides a general explanation of the categories of credentials as described in WIOA and further defined in TEGL 10-16.

Secondary School Diploma
Per TEGL 10-16, "a secondary school diploma (or alternate diploma) (commonly referred to as high school diploma) is one that is recognized by a State and that is included for accountability purposes under the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the Every Student Succeeds Act (ESSA). A secondary school equivalency certification signifies that a student has completed the requirements for a high school education. The types of recognized equivalents, for those not covered under ESEA, that would satisfy the credential attainment performance indicator are those recognized by a State."

Postsecondary Credentials
Per TEGL 10-16, a recognized postsecondary credential "means 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." A postsecondary credential is recognition of an individual's attainment of measurable technical or occupational skills necessary to obtain employment or advance within an occupation. Generally, these technical or occupational skills are based on standards developed or endorsed by employers.

Determination of Credential Completion and Qualification
Credit hours are building blocks for educational and training credentials. A document certifying the successful completion of a prescribed program of study (such as a diploma) or the attainment of satisfactory scores for a program of study (such as a high school equivalency exam or industry-recognized certification) constitutes a credential. Individual credit hours – building blocks – within a program of study do not constitute a credential. The completion of one course taken at a postsecondary educational institution does not constitute a credential. The compilation of coursework (an organized program of study) leading to the attainment of an Associate's degree does constitute a credential. All coursework young adults take toward obtaining a diploma or high school equivalency degree, for additional postsecondary education, or training modules passed as part of a curriculum for certification are beneficial to the youth and enhance the potential to be self-supporting; however, only those accredited certifications obtained after satisfactory completion of an organized program of study meet the definition of a credential.

A variety of different public and private entities issue credentials, including:
- 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 (20 USC 1002) that is qualified to participate in the student financial assistance programs authorized by title IV of that Act;
- 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;
- ETA's Office of Apprenticeship or a 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; and
- Job Corps, which issues certificates for completing career training programs that are based on industry skills standards and certification requirements.

Additional information on what constitutes a credential within each of these categories can be found in TEGL 10-16.

5. Construction Credentials within YouthBuild Programs. While there are additional credentials that qualify under the criteria described in TEGL 10-16, there are four construction credentials that are nationally recognized as meeting the criteria for qualifying credentials under the degree/certificate attainment rate measure and are commonly used by YouthBuild programs. These consist of:

- National Center for Construction Education and Research (NCCER) credential;
- Home Builders Institute's Pre-Apprenticeship Certificate Training (HBI-PACT) credential;
- North America's Building Trades Unions' Building Trades Multi-Craft Core Curriculum (MC3) credential; and
- Building Performance Institute, Inc. (BPI) credential.

Importantly, both the NCCER and HBI-PACT curricula consist of multiple modules that are stackable and, once successfully completed, lead to certification. In NCCER, participants must complete eight of the nine core curriculum modules in order to attain certification. With HBI-PACT, participants must complete some core modules and are then allowed to select areas of specialization upon which to build, with competencies tracked through Skill Achievement Records. It is only once all required modules are completed within each of these curricula that the industry-recognized certification for each curriculum is awarded. MC3 and BPI do not utilize modules but rather consist of one curriculum which must be successfully completed in its entirety for certification.

Instruction in individual modules can be very beneficial to participants and assists with project-based learning and general skill building; however, certification that leads to career pathways is specific to successful completion of the full curricula and attainment of the credential. YouthBuild grantees must not enter individual modules into the MIS as a demonstration of industry-recognized certification, as individual modules are not certifications. You can find additional information on each of these certificate training programs on the Web sites for each program, cited under the References section of this TEGL.

6. Additional Credentials. Some YouthBuild programs offer additional programs of study that may lead to the attainment of an industry-recognized credential, such as computer classes leading to certification in Microsoft Office or coursework leading to licensure as a Certified Nursing Assistant. YouthBuild programs should again refer to TEGL 10-16 for guidance on the qualifying credentials within these additional industries. However, DOL does not consider certificates awarded in recognition of the attainment of generic pre-employment or work-readiness skills (i.e., resume writing, interviewing, dressing for success) as qualifying credentials under TEGL 10-16. Certificates offered for perfect attendance or for completing leadership development courses, as well as any activities connected to community service hours, do not qualify as industry-recognized credentials under TEGL 10-16. Additionally, certifications that may be required for employment but do not, in and of themselves, demonstrate employment-specific skills (i.e., Cardiopulmonary Resuscitation (CPR), OSHA-10, HAZMAT certifications, Lead Abatement certifications, Asbestos Removal certifications, and Confined Space certifications) also do not qualify as credentials, because they do not meet the threshold of being able to document "measurable technical or occupational skills necessary to gain employment or advance within an occupation." While these are all beneficial building block skills for youth to achieve, they should not be reported as credentials within the YouthBuild MIS. YouthBuild programs should ensure that all certificates or degrees entered into the YouthBuild MIS meet the definition of qualifying credentials. The Department of Labor reserves the right to conduct reviews of the credentials submitted into the web-based case management system for credential attainment outcomes and to request removal of non-qualifying credentials, in order to ensure the accuracy of performance indicator reporting.

7. Identifying Credentials
The Department of Labor's Career Info Net supports several resources that provide information on credentials. Specifically, this web site includes a searchable Licensed Occupations database at
http://www.careerinfonet.org/licensedoccupations/lois_keyword.asp?nodeid=16&by=keyword.
This site provides information on the licensing agency, as well as examination requirements and any applicable fees. Additionally, there is also a Certification Finder tool to identify industry or occupational personnel certifications at
http://www.careerinfonet.org/certifications_new/default.aspx. This resource provides a description of the certification, as well as examination and work requirements.

8. Inquiries. Please address questions on this TEGL to the appropriate regional office.