October 21, 2022

Workforce Innovation and Opportunity Act Policy Letter No. 16-02.2

To: Workforce Innovation and Opportunity Act Local Workforce Development Board Directors, Fiscal Agents, and OhioMeansJobs Center Operators

From: Matt Damschroder, Director

Subject: Eligible Training Providers

I.   Purpose

The purpose of this policy is to establish the criteria for eligible training providers (ETPs) who may receive Workforce Innovation and Opportunity Act (WIOA) funding to provide training services and the procedures for approving them on the State ETP list.

II. Effective Date

Immediately

III. Rescission

ODJFS, Workforce Innovation and Opportunity Act (WIOA) Policy Letter No. 16-02.1 Eligible Training Providers.   (May 28, 2019)

IV. Background

The workforce development system established under the Workforce Innovation and Opportunity Act (WIOA) emphasizes informed consumer choice, job-driven training, provider performance, and continuous improvement. The quality and selection of providers and programs of training services is vital to achieving these core principles. The Ohio Department of Job and Family Services (ODJFS) plays a leadership role in ensuring the success of the ETP system in partnership with the local workforce development boards (WDBs), the OhioMeansJobs system, and its partners.

As required by section 122 of WIOA and 20 C.F.R. 680.400, the State, in partnership with the local WDBs, must identify providers of training services that are qualified to provide WIOA-funded training to adults, dislocated workers, and youth. Therefore, WIOA requires that each state maintain a list of ETPs and their programs of training services along with relevant

performance and cost information. The State must establish eligibility criteria and procedures for initial determination and renewals of eligibility for training providers and training programs to receive funds under WIOA title I-B. The State ETP list and the related eligibility procedures must ensure the accountability, quality, and labor-market relevance of programs of training services. In administering this process, the State and local workforce development areas must work to ensure that qualified providers offering a wide variety of job-driven training programs are available.

An individual training account (ITA) is one of the primary methods through which training is financed and provided for adults, dislocated workers, and youth, including youth who are in school and permitted to receive ITAs through waiver authority granted by the United States Department of Labor (USDOL). ITAs are established on behalf of a WIOA participant to purchase a program of training services from ETPs. Further guidance may be found in the policy letter on the use of ITAs.

Providers of on-the-job training (OJT), customized training, incumbent worker training, internships, paid or unpaid work experience, or transitional jobs are not funded through ITAs, are not required to be included on the State ETP list, and are not subject to the eligibility criteria pertaining to ETPs.

Pursuant to the State policy letters on training services for adults and dislocated workers and youth program services, and paragraph (E)(4) of rule 5101:14-1-02 of the Administrative Code, training services and occupational skills training for which ITAs are used shall only be delivered by providers who have met the eligibility criteria and are included on the State ETP list.

V. <u>State Requirements</u>

A. Management of the State ETP List

ODJFS is responsible for establishing the criteria, information requirements and procedures for the State ETP list, including procedures identifying the respective roles of the State and the local areas governing the eligibility of ETPs. The State will review all applications for inclusion on the State ETP list and will notify each training provider via e-mail of the approval or denial decision for the provider and for each training program proposed by the provider.

The State is responsible for the following activities:
1. Ensuring the development and maintenance of the State ETP list;
2. Ensuring programs meet the eligibility criteria and performance levels established by the State;
3. Removing programs that do not meet State-established program criteria or performance levels;

4. Taking appropriate enforcement actions against providers that intentionally provide inaccurate information or that substantially violate the requirements of WIOA; and
5. Disseminating the State ETP list to the public and the local WDBs.

B. Dissemination of State ETP List

To assist participants in choosing employment and training activities, the State ETP list will be disseminated to local WDBs in the state, members of the public, the OhioMeansJobs delivery system, and program partners, including the State's secondary and post-secondary education systems.

To ensure informed consumer choice, the State ETP list is widely available to the public through electronic means and includes searchable databases. The State ETP list is accessible to individuals seeking information on training outcomes and participants in employment and training activities funded under WIOA, including individuals with disabilities.

The State ETP list contains appropriate information to assist participants in choosing employment and training activities, including:

1. Recognized post-secondary credential(s) offered;
2. Provider-supplied information as part of eligibility; and
3. Training program performance and cost information.

VI. <u>Eligibility Requirements for ETPs</u>

A. Eligible Training Providers (ETPs)

ETPs may include:

1. Accredited institutions of higher education that provide programs which lead to recognized post-secondary credentials;
2. Entities carrying out programs registered under the National Apprenticeship Act (29 U.S.C. 50); or
3. Public or private for-profit providers of training services, which may include but are not limited to:
   a. Community-based organizations;
   b. Joint labor-management organizations; and
   c. Eligible providers of adult education and literacy activities under title II of WIOA (in Ohio, known as Aspire) if such activities are provided in combination with occupational skills training.

Ohio may approve training providers who do not have a physical training location

in Ohio, if the provider meets all other eligibility and performance reporting criteria.

B. Provider Initial Eligibility

Any provider offering a program of training services to be funded through WIOA using ITAs must be included on the State ETP list. Except for registered apprenticeship programs, all providers must first apply for consideration by submitting all required information in the State's designated online system for managing the State ETP list.

To qualify as an ETP in Ohio, a provider of training services must meet the following criteria:

a. Remained in business for two years or longer;
   i. As indicated by the date upon which the provider initially registered with the Ohio (or other state) Secretary of State.
b. Registered with the Ohio Secretary of State to do business in Ohio, is exempted from such registration, or registered to do business in another state if the provider does not have a significant presence in Ohio;
c. Is not debarred, suspended, proposed for disbarment, declared ineligible, or voluntarily excluded from participation in transactions by USDOL or the State of Ohio;
d. Does not owe any outstanding tax liability to the State or Federal government more than six months past due; and
e. Does not owe any outstanding civil, criminal, or administrative fines or penalties at the State or Federal level.

ETPs may apply for approval of programs of training services at any time after their provider application has been approved.

C. Provider Continued Eligibility
To remain active on the State ETP list and continue to receive WIOA funding, an ETP must renew its provider status in the State's designated system for managing the State ETP list at least once every 12 months following the date of the previous approval. The provider renewal process requires an update of basic provider information.

The State will review all submitted renewal requests and will terminate and remove providers that fail to meet criteria necessary to remain eligible. The training provider will be notified via e-mail when its status has either been renewed or terminated.

If an ETP does not renew its provider status within 90 days following the 12-month renewal date, the provider will be terminated and removed from

the State ETP list. The training provider will no longer be permitted to provide ITA services funded by WIOA until completing the initial eligibility process described above and obtaining ODJFS approval.

D.   Program Initial Eligibility

After the provider application has been approved, the provider may apply for approval of their programs of study, A provider will not appear in a public search of the state of Ohio's ETP list until they have at least one approved program.

For each program of training services to be offered by the provider, all of the required information fields must be submitted in the State's designated online system for managing the State ETP list. For initial eligibility, this information includes but is not limited to:
1.   Description of each program of training services to be offered;
2.   Information addressing a factor related to WIOA performance indicators;
3.   Information concerning whether provider is in a partnership with a business.; and
4.   Information addressing the alignment of training with in-demand industry sectors and occupations

Program Performance for Initial Eligibility

To assist participants in selecting training activities and providers of training services, for an initial eligibility approval, ETPs are required to provide outcome data for at least one of the below indicators of program performance for individuals who attended each approved training program:

a. Employment 2nd Quarter after exit;
b. Employment 4th Quarter after exit;
c. Median earnings in the 2nd Quarter after exit, or
d. Graduation or Credential attainment rate.

"After exit" in this context means after a student has left the program or has graduated.

ETPs are responsible for ensuring the timeliness and accuracy of their performance reports. Failure to submit this information will result in removal from the ETP list. The State will review all submitted initial approval requests and will deny programs that fail to meet the criteria necessary to remain eligible. The training provider will be notified via e-mail when its program status has either been approved or denied.

E. Program Continued Eligibility

To remain active on the State ETP list and continue to receive WIOA funding, an ETP must renew each of its programs in the State's designated system for managing the State ETP list at least once every 12 months following the date of the previous approval.

The renewal process requires an update of the information pertaining to each program offered by the ETP, and the indicators of program performance to reflect outcomes using the most recently available data that pertain to each performance measure (if such data are available) as required for performance reporting.

For a continued eligibility determination, ETPs are required to submit all required information which includes but is not limited to:

1. ETP performance on WIOA performance indicators
2. Information regarding access to training services throughout the state (including rural areas and through technology use).
3. Information reported to state agencies on federal and state training programs other than WIOA Title I-B programs.
4. The degree to which training programs relate to in-demand industry sectors and occupations in the state.
5. State licensure requirements of training providers, and licensing status of providers of training services, if applicable.
6. ETP's ability to offer industry-recognized certificates and credentials.
7. ETP's ability to offer programs that lead to a recognized post-secondary credential.
8. Quality of the program of training services including a program that leads to a recognized postsecondary credential.
9. ETP's ability to provide trainings that are physically and programmatically accessible for individuals who are employed and individuals with barriers to employment, including individuals with disabilities.

Program Performance for Continued Eligibility

For a continued eligibility determination, ETPs are required to provide outcome data for all four of the below indicators of program performance for individuals who attended each approved training program:

a. Employment 2nd Quarter after exit;
b. Employment 4th Quarter after exit;
c. Median earnings in the 2nd Quarter after exit, or

d. Graduation or Credential attainment rate.

The State will review all submitted program renewal requests and will remove programs that fail to meet the criteria necessary to remain eligible. The training provider will be notified via e-mail when its program has either been renewed or denied.

If an ETP does not renew the status of one or more of its training programs within 90 days following the 12-month renewal date for that program, the program(s) will be removed.

ETPs are responsible for ensuring the timeliness and accuracy of their performance reports. Failure to submit this information will result in removal from the ETP list. The State will review all submitted continued eligibility requests and will deny programs that fail to meet the criteria necessary to remain eligible. The training provider will be notified via e-mail when its program status has either been approved or denied.

F. Registered Apprenticeship Programs

Registered apprenticeship programs, upon approval by ODJFS, are given the opportunity to be included on the State ETP list. Sponsors may request to be excluded. When applying to become a registered apprenticeship program, the sponsor will be informed of this opportunity and the benefits of inclusion on the State ETP list.

Once included on the State ETP list, registered apprenticeship programs will remain on the list until they are deregistered or until the registered apprenticeship program notifies ODJFS that it no longer wishes to be included on the list. All registered apprenticeship programs listed on the statewide ETP list must also be located on all local ETP lists.

National Apprenticeship programs are automatically eligible for inclusion on the State ETP list. National programs are not required to register their program in the State of Ohio in order to gain inclusion on the ETP list.

Inclusion of a registered apprenticeship program on the State ETP list allows eligible adults, dislocated workers, and youth who are authorized to receive ITAs to use WIOA funds to cover the costs of classroom training provided as part of the apprenticeship program, subject to policy limitations by ODJFS or the local WDB. All registered apprenticeship programs are considered to be in-demand. Local areas do not need to determine occupational-demand status for registered apprenticeship sponsors who are hiring.

G. Loss of ETP Eligibility

A training provider must deliver results and provide accurate information to retain its status as an ETP. If a change should occur between eligibility review periods, training providers must immediately submit to ODJFS information regarding any changes in their eligibility and/or accreditation. Providers must disclose any factors that may change their eligibility status. Failure to do so may result in a finding of a substantial violation and removal from the State ETP list.

<u>Criteria for Substantial Violations</u>

ODJFS considers an institution to have committed a "substantial violation" when:

1. ODJFS determines that the institution intentionally supplied inaccurate information.
2. ODJFS determines that the institution has substantially violated any provision of title I of WIOA or the WIOA regulations, including 29 CFR part 38.
3. There is an order against the institution under 29 CFR 38.113 suspending, terminating, denying, or discontinuing WIOA Title I financial assistance to the institution.

If ODJFS determines that an institution committed a substantial violation, ODJFS will remove the institution and all its programs, including registered apprenticeships, from the State ETP list for a minimum of two years. The period of removal lasts for two years from the date of that determination. However, the period of removal may extend beyond two years if there are multiple determinations stemming from multiple levels of review, including determinations made under 29 CFR part 38. The two-year period, in these cases, is calculated from the date of the final determination. During the period of removal, the institution is prohibited from publishing new training programs to the State ETP list. ODJFS determines WIOA substantial violation periods of noncompliance and fund reclamation procedures on a case-by-case basis.

A provider of training services whose eligibility is terminated for committing a substantial violation shall be liable for the repayment of funds improperly secured or received during the period the violation(s) occurred.

Typically, ODJFS terminates a training program's eligibility and removes it from the ETPL website during the continued eligibility process; however, ODJFS may terminate eligibility at any time if it determines that there are grounds to do so. When ODJFS terminates a training program's ETPL eligibility, it sends an email that identifies the reason(s) for the termination.

Programs may also be removed during routine reviews or during continued eligibility reviews, if ODJFS determines that the program does not meet the criteria outlined for inclusion.

H. Appeal Process for ETPs

Per 20 C.F.R. 680.480, providers of training services who have been rejected from Ohio's eligible training program list may appeal this decision using the following procedure. This procedure remains the same for appealing the rejection of a training program.

1. Within 14 days from the date the rejection notice was received, the provider may file an appeal to the Office of Workforce Development by submitting in writing all of the following information:
   -A statement appealing the rejection;
   -Information as to why the training program should be eligible; and
   -Who the primary point of contact for the training provider will be.

   Providers should also submit any documentation pertaining to the program or credential associated with the program. For example-information regarding the credential attained upon completion of the program.

2. The written appeal shall be submitted to WIOAQNA@jfs.ohio.gov.

   The State will review the appeal and conduct an internal hearing process using the information submitted in the appeal and issue a written decision/response within 60 days of the receipt of the appeal.

VII. Credential Types

A. Recognized Postsecondary Credential (RPC)

RPCs are awarded in recognition of an individual's attainment of measurable technical or industry/occupational skills necessary to obtain employment or advance in a career. RPCs are the credential type most likely to result in employment in an in-demand job and the only credential type that results in a positive outcome for the credential attainment performance measure related to workforce programs. As such, only programs that result in an RPC will be accepted on the State ETP list.

An RPC is defined as one of the following:
1. An industry-recognized certificate or certification;
2. An occupational license recognized by the state or federal government;
3. A certificate of completion of a registered apprenticeship program; or
4. An associate or baccalaureate degree.

B. **Embedded Stackable Credential (ESC)**

An ESC is a minor certification that is a component piece within a more comprehensive training regimen leading to an RPC. The ESC measures interim skill gains toward completion of the RPC. For example, earning a Certified Production Technician credential requires completion of a safety certification. The safety certification alone would be considered a Basic Skill Certification and would not be included on the State ETP list. However, when the safety certification is embedded into a broader RPC program, this program may be included on the State ETP list and funded through an ITA.

C. **Basic Skill Certification (BSC)**

A BSC is a stand-alone verification of entry-level job skills such as First Aid, CPR, safety, hygiene, forklift operation, or aptitude at operating a computer. These minor certifications are not considered RPCs, even if broadly required to enter employment. Therefore, programs that result in such credentials are not included on the State ETP list. Basic Skills Certifications are not considered occupational skills training under WIOA and are not funded through an ITA.

D. **Work Readiness Certificate (WRC)**

A WRC verifies an individual's possession of characteristics and soft skills known to lead to success in the workplace such as punctuality, telephone etiquette, work ethic, and basic academic skills including math, writing, or basic computer usage. WRCs are not considered RPCs and are not included on the State ETP List.

Local WDBs may use procurement methods other than the State ETP list to fund these minor credentials that verify basic skills and work readiness where necessary and appropriate.

Attachment A to this policy provides additional guidance on the defining characteristics of RPCs and other types of workforce credentials along with a checklist template that local areas may use or adapt to determine whether a credential meets the RPC criteria.

VIII. **Local WDB Requirements**

The local WDB is responsible for the following activities pertaining to ETPs:

1. Carrying out procedures assigned to the local WDB by the State, such as informing the State of concerns related to the quality of providers or

inaccurate performance data;

2. Working with the State to ensure there are sufficient numbers and types of providers of training services, including ETPs with expertise in assisting individuals with disabilities or in need of adult education and literacy activities; and

3. Ensuring the wide dissemination and appropriate use of the information available in the State ETP list.

Additionally, the local WDB may:

1. Make recommendations to the State on the best procedure for identifying qualified ETPs;

2. Request additional information from ETPs to assist adults, dislocated workers, and youth in making an informed choice; and

3. Conduct site visits to assess the quality of the providers, and report on the findings.

Local WDBs may supplement information requirements defined in this policy to support informed customer choice and the achievement of local performance measures. This additional information may include:

1. Information on programs of training services that are linked to local in-demand occupations;

2. Information that shows how programs are responsive to local workforce development area needs; and

3. Other appropriate information related to the objectives of WIOA.

Local WDBs are not required to provide WIOA funding to a training provider listed on the State ETP list and may establish local policy regarding how ETPs will be utilized locally. However, this policy must not inhibit consumer choice. For example, a local WDB may decide against using ETPs that did not provide data on the indicators of program performance if a sufficient number of ETPs remain available within a reasonable commuting distance for participants to receive the training services they need to enter in-demand occupations.

IX. <u>Technical Assistance</u>

Requests for technical assistance may be sent to ODJFS, Office of Workforce Development: WIOAQNA@jfs.ohio.gov.

X. <u>References</u>

Workforce Innovation and Opportunity Act, §§ 122, 123, 129, 134, and 188, Public Law 113-128.

20 C.F.R. §§ 680.340, and 680.400 through 680.510.

29 C.F.R Part 38

O.A.C. 5101:14-1-02(E)(4).

ODJFS, Workforce Innovation and Opportunity Act Policy Letter No. 15-09.1, Training Services for Adults and Dislocated Workers (January 8, 2018).

ODJFS, Workforce Innovation and Opportunity Act Policy Letter No. 15-10, Youth Program Services (July 15, 2015).

ODJFS, Workforce Innovation and Opportunity Act Policy Letter No. 15-11.3, Use of Individual Training Accounts (ITA) (September 27,2021).

ODJFS, Workforce Innovation and Opportunity Act Policy Letter No. 17-04.1, Waivers for Implementation of the Comprehensive Case Management and Employment Program (October 14,2020).

USDOL, Training and Employment Guidance Letter (TEGL) No. 8-19, Workforce Innovation and Opportunity Act (WIOA) Title I Training Provider Eligibility and State List of Eligible Training Providers (ETPs) and Programs, (January 2, 2020).

USDOL, Training and Employment Guidance Letter (TEGL) No. 8-19 Change 1, Guidance on Registered Apprenticeship Provisions and Opportunities in the Workforce Innovation and Opportunity Act (WIOA), (May 17, 2021).

Attachment A: Credential Classification Checklist Template

Attachment B: Glossary

Ohio | Department of Job and Family Services

Mike DeWine, Governor **Matt Damschroder**, Director
Jon Husted, Lt. Governor

ATTACHMENT A:
CREDENTIAL CLASSIFICATION CHECKLIST TEMPLATE

Participants enrolled in services funded under title I-B of the Workforce Innovation and Opportunity Act (WIOA) and under the Comprehensive Case Management and Employment Program (CCMEP) may receive assistance in obtaining degrees, certifications, licenses, and other credentials that verify the attainment of skills needed to enter career paths in demand occupations. This template identifies and compares the most common types of credentials that the workforce programs may fund and provides a checklist to help classify a credential by its type to ensure proper reporting of service delivery and performance outcomes.

A **Recognized Postsecondary Credential (RPC)** is awarded in recognition of an individual's attainment of measurable technical or industry/occupational skills necessary to obtain employment or advance in a career. RPCs are the credential type most likely to result in employment in an in-demand job and the only credential type discussed in this document that results in a positive outcome for the credential attainment performance measure. An RPC is defined as one of the following:

1. An industry-recognized certificate or certification;
2. An occupational license recognized by the state or federal government;
3. A certificate of completion of a registered apprenticeship program; or
4. An associate or baccalaureate degree.

The costs of occupational skills training necessary for participants to earn RPCs may be funded using an Individual Training Account (ITA) or, in some limited circumstances, by service contracts (see ITA exceptions in 20 C.F.R. § 680.320).

An **Embedded Stackable Certificate (ESC)** is a minor certification that is a component piece within a more comprehensive training regimen leading to an RPC. The ESC measures interim skill gains toward completion of the RPC. For example, earning a Certified Production Technician credential requires completion of a safety certification. For participants on track to earning the full Production Technician credential, the embedded safety certification may be funded through an ITA and reported as a measurable skill gain, but the safety certification itself is not a stand-alone RPC and does not count as a positive outcome in the credential attainment performance measure.

A **Basic Skill Certification (BSC)** is a stand-alone verification of entry-level job skills such as First Aid, CPR, safety, hygiene, forklift operation, or aptitude at operating a computer. These minor certifications are not considered RPCs, but they enable entry-level employment and attainment of work experience. Individuals who have only earned a BSC should ideally continue in training services to obtain the more technical and sought-after RPC, described above, so they can advance in their career paths beyond entry level.

A **Work Readiness Certification (WRC)** uses assessment to determine an individual's possession of characteristics and soft skills known to lead to success in the workplace such as punctuality, telephone etiquette, work ethic, and basic academic skills including math, writing, or basic computer usage. Examples of WRCs include the National Career Readiness Certificate (NCRC) and the OhioMeansJobs-Readiness Seal. Some local workforce development boards also issue their own locally-recognized WRCs.

The following chart lists the workforce program services that may be provided to help participants earn each type of credential and the performance outcomes the area may report when the credential is completed:

	Workforce Credential Classifications			
	Recognized Postsecondary Credential (RPC)	Embedded Stackable Certificate (ESC)	Basic Skill Certification (BSC)	Work Readiness Certificate (WRC)
May be provided through occupational skills training	✔	✱		
For Adults & Dislocated Workers, may be provided as an individualized career service (i.e., short-term pre-vocational service)			✔	✔
For CCMEP, may be provided as education tied to a work experience			✔	✔
For CCMEP, may be provided as education concurrent with workforce prep and occupational skills training	✔	✱	✱	
May be provided as part of the WIOA or CCMEP assessment process				✔
Completion is a measurable skill gain under the performance measures	✔	✔		
Completion is a credential attainment under the performance measures	✔			
Provider must be included on the State's eligible training provider list (or meet an exception under 20 C.F.R. § 680.320)	✔	✔		

✱ *This service will include the participant in the credential attainment measure, but the resulting credential, by itself, is not a positive performance outcome.*

The following template may be used or adapted by local areas to evaluate a credential and classify it by type. Proper classification of credentials will ensure accurate reporting of services and performance measure outcomes and appropriate entries of providers in the State's eligible training provider list.

CREDENTIAL CLASSIFICATION CHECKLIST TEMPLATE

Local Area:		Name of Credential:	
Evaluator:		Training Provider:	

To qualify as a Recognized Post-Secondary Credential (RPC), a credential must meet the requirements for one of the following:
    I. Industry-Recognized Certificate or Certification (IRC);
    II. Registered Apprenticeship Program Certificate;
    III. Occupational License; or
    IV. Associate or Baccalaureate Degree.

Three non-RPC classifications may also be funded by workforce programs:
    V. Embedded Stackable Certificate (ESC)
    VI. Basic Skill Certification (BSC)
    VII. Work Readiness Certificate (WRC)

Instructions: For each statement below, checkmark the "Yes" column if true or "No" if false pertaining to the credential under review. Classify the credential by type according to the scoring instructions under each section and your overall judgement based on the answers.

I. Industry-Recognized Certificate or Certification (IRC)

A. Approval by a State Education Department

The Ohio Department of Education (ODE) screens industry-recognized credentials that its students may earn and maintains a website by industry sector listing the approved credentials. Each ODE-approved IRC receives a point value representing employer demand, which should be 3 or higher for the credential to be considered an RPC by a workforce program.

The Ohio Department of Higher Education (ODHE) also reviews industry credentials and maintains a list of those that meet ODHE standards for quality and employer demand.

(Note: The full website addresses for the links found throughout this document are listed in Appendix II, Web Addresses of Online Resources.)

		Yes	No
1.	The credential is listed on ODE's IRC website with a point value of 3 or higher.	☐	☐
2.	The credential is listed by ODHE as an approved industry credential.	☐	☒

A "Yes" answer to either of the above statements indicates the credential has been vetted by a state government agency and was deemed to be an RPC. Therefore, related training for a participant to obtain the RPC may be funded by workforce programs as an occupational skills training service.

I. Industry Recognized Certificate or Certification (IRC), *continued*

B. Measurement of Technical or Industry/Occupational Skills

An IRC verifies that an individual has gained complex and job-specific technical skills, not basic or work readiness skills such as safety, hygiene, punctuality, reading or math, software usage, or First Aid.

A certification that can be quickly obtained by a novice is not an IRC because training is not needed by most people to earn it. Also, the demand by employers is not significant if new hires could easily obtain the credential after starting the job, and IRCs must be, by definition, in demand by employers.

	Yes	No
1. The credential verifies technical skills beyond basic entry-level skills.	☐	☐
2. The credential usually requires classroom and/or on-the-job training to earn.	☐	☐

A "No" answer to any of the above statements indicates the credential is not an RPC. Complete sections VI and VII to determine if it could be provided as a BSC or WRC.

C. Endorsement by an Industry Certifying Body or Product Manufacturer

In some industries, an organization or society (often a non-profit agency) has been established as the expert voice on the skills needed to work in specific jobs in the industry. This certifying body may assess worker competence through testing, verify the attainment of job-related technical skills, and/or oversee the quality of training providers who prepare workers to earn certifications. Employers in the industry rely on credentials issued or endorsed by the certifying body as indicators of aptitude when making their hiring decisions.

The following certifying bodies have long-standing nationwide acceptance from employers:

Industry / Occupation	Certifying Body
Manufacturing	MSSC, NIMS
Construction	NCCER
Information Technology	CompTIA
Allied Health Care	AMCA
Automotive Repair	ASE
Welding	AWS

The certifications issued or endorsed by these established, industry-recognized quality overseers are stackable, portable, and lead to employment, so workforce programs may fund the occupational skills training needed to earn such credentials.

Some multi-national corporations that sell business products worldwide also operate education programs and issue certifications of high-level user competence. Skill certifications issued by Cisco, Microsoft, Oracle, and Snap-On Tools, for example, are considered IRCs as well.

	Yes	No
1. The credential is issued or endorsed by the industry's nationally-recognized certifying body	☐	☐
2. The credential is issued by a multi-national corporation with education and certification programs	☐	☐

Any "Yes" answer indicates that occupational skills training needed to obtain the credential may be funded by the program.

Complete the next section (section I, D) to evaluate if the certification is a stand-alone RPC that may be reported as a success in the credential performance measure.

I. Industry Recognized Certificate or Certification (IRC), *continued*

D. Industry-Specific, Employer-Recognized, and Portable

IRCs recognize mastery of the skills needed to obtain employment or advance along an in-demand career path. These technical occupational skills should be specific to one industry and based on standards defined by employers from that industry.

Certifications of competencies that are valued across many industries such as customer service, safety (e.g, OSHA), or CPR are not unique to a single industry, so they do not qualify as IRCs. These stand-alone minor certifications may be considered BSCs (see section VI).

An IRC must be recognized and valued as an indicator of competence by employers. Therefore, job postings placed by employers in the industry should list the credential as a required or preferred qualification, which verifies some level of employer demand. The more job postings that require a credential, the more probable it is an IRC. If individuals are just as likely to obtain a job whether they hold the credential or not, then it is unlikely that the credential is an IRC related to that occupation.

An IRC is portable. It should be sought by employers across the nation or globe. Obtaining an IRC should enhance mobility and employability, protecting a worker from local fluctuations in demand for their skills. Therefore, if employers from other states or regions are seeking workers who hold the credential, it is likely to be an IRC.

	Yes	No
1. The credential verifies skills specific to one industry rather than skills valued across industries.	☐	☐
2. The credential is a required or preferred qualification on multiple job postings found in OhioMeansJobs.com.	☐	☐
3. The credential is needed to enter a career that is included on Ohio's Top Jobs List.	☐	☐
4. The credential is sought by employers in other states or countries.	☐	☐
5. The credential is in the Certification Finder on CareerOneStop.org with the In-Demand indicator →	☐	☐

The above factors should be taken into consideration to make an overall judgement call. Not all items must be answered "Yes" for the credential to be classified as an RPC.

A greater number of "Yes" responses than "No" responses indicates that the credential is most likely an RPC.

This concludes the IRC analysis. Use your above responses to formulate an overall judgement on whether the credential meets the criteria of an IRC.
Continue to the next section if the credential is not an IRC.

CREDENTIAL CLASSIFICATION CHECKLIST TEMPLATE

II. Registered Apprenticeship Program Certificate

The Ohio State Apprenticeship Council (OSAC) oversees and certifies Registered Apprenticeship (RA) training programs. Workforce program participants may receive funding for occupational skills training to attend any OSAC-approved RA program offering entry into a wide range of in-demand apprenticeship occupations. The certificate of completion from an RA program is an RPC.

OSAC also approves pre-apprenticeship programs. The completion of an OSAC-recognized pre-apprenticeship program also qualifies as an RPC.

	Yes	No
The credential is a certificate from a state-recognized Registered Apprenticeship.	☐	☐
The credential is a certificate from a state-recognized pre-apprenticeship program.	☐	☐

Answering "Yes" to either item indicates that the credential is an RPC.

III. Occupational License

Workers in some occupations are required to obtain licensure from the state or federal government or an oversight board to ensure the safety and quality of their work. Examples include truck drivers, nurses, real estate agents, and barbers.

Many such licenses require completion of training, work experience, and passage of a test to document aptitude. If the job is in demand at the state or local level, costs of obtaining the license may be funded by the program as occupational skills training.

A database established by the National Conference of State Legislatures provides more information on the most common occupational licenses.

	Yes	No
1. The license is required for the worker to perform an in-demand job.	☐	☐
2. The license is issued by a federal agency, state department, or state board.	☐	☐

Answering "Yes" to both above items indicates that the license is an RPC

Note: Appendix IV provides a list of online resources identifying Ohio training providers approved to deliver license-related training.

IV. Associate or Baccalaureate Degree

Postsecondary degrees issued by institutes of higher education, including public institutions and authorized independent schools, qualify as WIOA RPCs, except for graduate degrees (*i.e.,* Masters or Doctoral degrees).

Also, to be funded by a workforce program, the degree must lead to a job that is in demand at the state or local level.

	Yes	No
A. The credential is an Associate or Bachelor degree from an institute of higher education.	☐	☐
B. The credential leads to an in-demand occupation.	☐	☐

Answering "Yes" to both items indicates the credential is an RPC.

This concludes the RPC analysis. Continue to the next section if the credential is not an RPC.

V. Embedded Stackable Certificate (ESC)

ESCs are minor or interim certifications within in a comprehensive training regimen that leads to an RPC. ESCs enable workers to develop skills and advance in their careers in shorter intervals than traditional degree or certificate programs.

One type of ESC is the ODHE Technical Certificate. ODHE has a formal approval process for Technical Certificates with aligned Technical Assessments being issued by Ohio Adult Technical Centers and Technical Certificates issued by Ohio public colleges and universities. These stackable certificates are building blocks toward an associate degree that are meant to qualify students for employment or licensure before completing their degrees.

Training that leads to an ESC, including an ODHE Technical Certificate or Assessment, may be funded as occupational skills training if the participant intends to continue training to complete the related RPC.

	Yes	No
1. The credential does not stand alone as an RPC.	☐	☐
2. The credential is a component part within an over-arching RPC regimen.	☐	☐
3. The credential is approved by ODHE as a Technical Certificate or Technical Assessment.	☐	☐
4. The participant intends to continue training to complete the full RPC.	☐	☐

Answering "Yes" to three of the four above items indicates the credential is an ESC. An ESC may be provided through occupational skills training. However, completion of an ESC by itself does not count as a positive outcome for the credential attainment performance measure.

VI. Basic Skill Certification (BSC)

A BSC is a stand-alone certification of entry-level skills of low to moderate complexity (such as First Aid, CPR, OSHA, ServSafe® Food Handler, forklift operator, aptitude with using Word, Excel or other software applications, etc.).

BSCs may help participants with barriers verify their job-readiness and obtain employment, so they are helpful to individuals with no diploma or post-secondary certifications. Any instruction needed to earn a BSC is not considered occupational skills training, but the costs may be covered under other service types such as adult individualized career services (i.e., short-term prevocational services) or the required educational component related to a youth's work experience.

	Yes	No
1. The credential does not meet the criteria of an RPC or ESC.	☐	☐
2. The credential verifies general, work-related basic skills or entry-level skills.	☐	☐
3. The credential would help the individual obtain a job or is related to a work experience.	☐	☐

Answering "Yes" to all three items indicates the credential is a BSC.

VII. Work Readiness Certificate (WRC)

A WRC verifies an individual's possession of employability skills, work ethic, or soft skills -- the foundational competencies to meet the demands of the workplace in general rather than technical skills or knowledge specific to an occupation or industry.

While the skills-based credentials discussed above require test passage to verify that specific knowledge was gained through training, many WRCs are awarded based on assessment of an individual's pre-existing learning, mental or physical abilities, personality traits, attitude, or work habits.

As with BSCs, WRCs may help job seekers with barriers or with no in-demand, skill-based credentials to find employment and gain work experience.

	Yes	No
1. The credential verifies employability, soft skills, or basic academic learning.	☐	☐
2. Training services or instruction are not needed by most individuals to obtain the credential.	☐	☐
3. Holding the credential may offer the job seeker an advantage in employer hiring decisions.	☐	☐

A "Y" answer for all three items indicates the credential is a WRC.

Final Determination of Credential Type

Based on the above criteria, check the box identifying the credential:

The credential is a Recognized Postsecondary Credential (RPC) of the following type:
☐ *I. Industry-Recognized Certificate or Certification (IRC)*
☐ *II. Registered Apprenticeship Program Certificate*
☐ *III. Occupational License*
☐ *IV. Associate or Baccalaureate Degree*

Although it is not an RPC, the credential is one of the following types that may be provided to eligible and appropriate workforce program participants:
☐ *V. Embedded Stackable Certificate (ESC)*
☐ *VI. Basic Skill Certification (BSC)*
☐ *VII. Work Readiness Certificate (WRC)*

Appendices:
- Appendix I: One-page Summary of Checklist Criteria
- Appendix II: Web Addresses of Online Resources
- Appendix III: Technical Assistance Documents and References
- Appendix IV: Resources for Verifying Authorized Occupational License Trainers

CREDENTIAL CLASSIFICATION CHECKLIST TEMPLATE

Appendix I: One-Page Summary of Checklist Criteria

	Credential Criteria	Y	N	Scoring
Recognized Post-Secondary Credential (RPC)	**I. Industry-Recognized Certificate or Certification**			
	A. Approval by State Education Department			
	1. Listed on ODE's IRC website with 3 or more points			*Any "Y" answer means it is an RPC.*
	2. Listed by ODHE as an approved IRC			
	B. Measurement of Technical or Industry/Occupational Skills			
	1. Verifies technical skills beyond basic entry-level			*Any "N" answer, it is not an RPC.*
	2. Requires classroom and/or on-the-job training to obtain.			
	C. Endorsement of an Industry Certifying Body or Product Manufacturer			
	1. Issued or endorsed by industry's recognized certifying body			*Any "Y" answer means it is either an RPC or ESC.*
	2. Issued by multi-national corporation that certifies highly skilled users of its business products			
	D. Industry-Specific, Employer-Recognized, and Portable			
	1. Verifies skills specific to one industry			*Entry of more "Y" responses than "N" responses generally means credential is likely an RPC.*
	2. Listed in multiple OhioMeansJobs.com postings			
	3. Needed for entry into an Ohio In-Demand occupation			
	4. Sought by employers in other states			
	5. In the Certification Finder with "In-Demand" flag → 🌶			
	II. Registered Apprenticeship Program Certificate			
	1. Certificate from state-recognized Registered Apprenticeship			*Any "Y" means credential is RPC.*
	2. Certificate from a state-recognized pre-apprenticeship			
	III. Occupational License			
	1. Required for worker to perform an in-demand job			*"Y" to both items indicates RPC.*
	2. Issued by federal or state agency or board			
	IV. Associate or Baccalaureate Degree			
	1. Postsecondary degree from an institute of higher ed.			*"Y" to both items indicates RPC.*
	2. Leads to an in-demand occupation			
ESC	**V. Embedded Stackable Certificate (ESC)**			
	1. Does not stand alone as an RPC			*"Y" answer to 3 or more items indicates credential is an ESC.*
	2. Is a component part within an over-arching RPC			
	3. Approved by ODHE as a Tech. Cert. or Assessment			
	4. Participant intends to complete the full RPC			
BSC	**VI. Basic Skill Certification (BSC)**			
	1. Does not meet above criteria of an RPC or ESC			*"Y" answer to all 3 items indicates BSC.*
	2. Verifies general work-related or entry-level skills			
	3. May help individual obtain a job or work experience			
WRC	**VII. Work Readiness Certificate (WRC)**			
	1. Verifies employability, soft skills, or basic academics			*"Y" answer to all three items means it is a WRC.*
	2. Training is usually not needed to obtain credential			
	3. May help individual obtain a job or work experience			

CREDENTIAL CLASSIFICATION CHECKLIST TEMPLATE

Appendix II: Web Addresses of Online Resources

Type the following web addresses in your browser to access the online resources referenced in the checklist.

Section	Online Resource	Web Address
I. Industry Recognized Certificate or Certification, page 1	Ohio Department of Education Industry-Recognized Credentials website	http://education.ohio.gov/Topics/Ohio-s-Graduation-Requirements/Industry-Recognized-Credentials-and-WorkKeys/Industry-Recognized-Credentials
	Ohio Department of Higher Education list of approved industry credentials	https://highered.ohio.gov/educators/academic-programs-policies/academic-program-approval/certificates-credentials/certificates-and-credentials
I. Industry Recognized Certificate or Certification, page 3	OhioMeansJobs.com job search page	https://jobs.ohiomeansjobs.monster.com/Search.aspx
	Ohio's list of in-demand careers	https://topjobs.ohio.gov
	Certification Finder on careeronestop.org	https://www.careeronestop.org/toolkit/training/find-certifications.aspx
II. Registered Apprenticeship, page 4	List of approved registered apprenticeship programs in Ohio	https://ohiomeansjobs.ohio.gov/job-seekers/practice-your-skills/occupation-search
III. Occupational License, page 4	Database of most common licensed occupations	http://www.ncsl.org/research/labor-and-employment/occupational-licensing-statute-database.aspx#Database
IV. Associate or Baccalaureate Degree, page 4	List of Ohio Public Institutions	https://highered.ohio.gov/about/ohios-campuses
	Independent colleges and universities in Ohio	https://highered.ohio.gov/about/ohios-campuses

CREDENTIAL CLASSIFICATION CHECKLIST TEMPLATE

Appendix III: Technical Assistance Documents and References

- 20 C.F.R. §§ 680.200 - 680.320.

- USDOL, Training and Employment Guidance Letter No. 15-10, Increasing Credential, Degree, and Certificate Attainment by Participants of the Public Workforce System, (December 15, 2010).

- USDOL, Training and Employment Guidance Letter No. 10-16, Change 1, Performance Accountability Guidance for Workforce Innovation and Opportunity Act (WIOA) Title I, Title II, Title III, and Title IV Core Programs, (August 23, 2017).

- USDOL, Training and Employment Guidance Letter No. 19-16, Guidance on Services provided through the Adult and Dislocated Worker Programs under the Workforce Innovation and Opportunity Act (WIOA) and the Wagner-Peyser Act Employment Service (ES), as amended by title III of WIOA, and for Implementation of the WIOA Final Rules, (March 1, 2017).

- USDOL, Training and Employment Guidance Letter No. 21-16, Third Workforce Innovation and Opportunity Act (WIOA) Title I Youth Formula Program Guidance, (March 2, 2017).

- ODJFS, Workforce Innovation and Opportunity Act Policy Letter 16-02, Eligible Training Providers, (November 10, 2016).

- Ohio Department of Education, *Industry-Recognized Credentials and WorkKeys*, http://education.ohio.gov/Topics/Ohio-s-Graduation-Requirements/Industry-Recognized-Credentials-and-WorkKeys, (last visited December 31, 2018).

- Ohio Department of Higher Education, *Certificates and Credentials*, https://www.ohiohighered.org/certificates-and-credentials, (last visited December 31, 2018).

- Manufacturing Skill Standards Council, *MSSC Board-Suggested Quality Assurance Guidelines and Rating System for Industry-Recognized Certifications*, http://files.constantcontact.com/7b7d1c26101/d754737c-207d-41f1-ab55-cf8f1df29fdf.pdf, (last visited December 31, 2018).

CREDENTIAL CLASSIFICATION CHECKLIST TEMPLATE

Appendix IV:
Resources for Verifying Authorized Occupational License Trainers

Providers authorized to deliver license-related training by an Ohio licensing body, as verified using the below links, are considered eligible training providers that may receive funding to provide occupational skills training to workforce program participants.

	Licensing Body	Programs/Occupations	Link
1	**Ohio Cosmetology and Barber Board - Barber Schools**	Barber	http://www.cos.ohio.gov/EXAM-SCHOOL-INFO/SCHOOL-INFORMATION/BARBERING
2	**Ohio Cosmetology and Barber Board - Cosmetology Schools**	Cosmetology programs	http://www.cos.ohio.gov/EXAM-SCHOOL-INFO/SCHOOL-INFORMATION/COSMETOLOGY After clicking on the link, choose between **Career Technical Schools, Private Schools**, or **Adult Education.**
3	**Ohio Dental Board**	Dental or Dental Hygiene (see American Dental Association link on the site.) Radiology courses (Dental Assisting), Expanded Function Dental Auxiliary, and Coronal Polishing (see available links.)	http://www.dental.ohio.gov/Education-Renewal/Initial-Training
4	**Ohio Board of Nursing**	Community Health Worker training programs	https://nursing.ohio.gov/licensing-certification-ce/community-health-
5	**Ohio Department of Insurance**	Insurance pre-licensing programs	https://gateway.insurance.ohio.gov/UI/ODI.Agent.Public.UI/EduCourseProvid
6	**Ohio Department of Public Safety**	Commercial Driver License (CDL)	https://apps.dps.ohio.gov/dets/
7	**Ohio Department of Public Safety**	Private Investigator or Security Guard services	https://services.dps.ohio.gov/PISGS/Pages/public/ProviderSearch.aspx
8	**Ohio Peace Officer Training Academy**	Private security training schools	https://www.ohioattorneygeneral.gov/Law-Enforcement/Ohio-Peace-Officer-Training-Academy/Directory-of-Peace-Officer-Basic-Training-Acad-%281%29

Term	Definition
Accreditation	Recognition by an accrediting agency that an institution or specific training program offered by the institution maintains standards for its graduates to gain admission to other reputable institutions of higher learning or to achieve credentials for professional practice.
Community-based organization	A private nonprofit organization (which may include a faith-based organization) that is representative of a community or a significant segment of a community and that has demonstrated expertise and effectiveness in the field of workforce development.
Eligible training provider (ETP)	An entity that meets the criteria and procedures established by the State to be eligible to receive WIOA title I-B funds to provide occupational skills training and to be included on the State ETP list.
Occupational skills training	An organized program of study that provides specific vocational skills that lead to proficiency in performing actual tasks and technical functions required by certain occupational fields at the entry, intermediate, or advanced level, and results in attainment of a recognized post-secondary credential.
Program of training services	One or more courses or classes, or a structured regimen, that leads to: 1. A recognized post-secondary credential; 2. A secondary school diploma or its equivalent; 3. Measurable skill gains toward the above credentials; or 4. Employment.
Recognized post-secondary credential (RPC)	A degree, license, or certification 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 awarded by an accredited college or university.

State ETP list	An online database of the ODJFS-approved training providers who may receive WIOA title I funds to provide training services to eligible WIOA title I-B participants, including relevant performance and cost information on each training program.