ADVISORY: TRAINING AND EMPLOYMENT GUIDANCE LETTER NO. 35-12

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

FROM: GERRI FIALA /s/
Acting Assistant Secretary
Employment and Training Administration

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

1. Purpose. To provide 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 three commonly used construction credentials for YouthBuild participants.

2. References.

- Workforce Investment Act of 1998 (WIA) 20 CFR 672
- National Center for Construction Education and Research (NCCER) Web site: www.nccer.org
- Home Builders Institute’s Pre-Apprenticeship Certificate Training (HBI-PACT) Web site: www.hbi.org/Programs/PreApprenticeship/HBIPACT.aspx

3. Background. Within the Department of Labor’s (DOL) Strategic Plan, one of the Secretary of Labor’s High Performance Goals 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 one of the YouthBuild program’s common performance measures. The purpose of
this guidance is to provide additional information on three commonly used construction credentials that meet the WIA definition and are appropriate for reporting in the YouthBuild Web-based Management Information System (MIS). Within this guidance, the term credential includes certificates, degrees, certifications, and licenses. 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. In formula programs, states determine whether a specific credential meets the definition for the measure. YouthBuild grantees should reach out to the local Workforce Investment Board and the state to learn which credentials the state has determined meet the definition, as well as utilizing the guidance contained within TEGL 15-10 to make determinations of qualifying credentials.

4. Credential Definition. Within the workforce system, the term credential refers to the verification of qualification or competence issued to an individual by a third party (such as an educational institution or an industry-certifying organization) with the relevant authority or assumed competence to issue such a credential. To qualify as a credential under TEGL 15-10, a credential must be awarded in recognition of an individual’s attainment of measurable technical or occupational skills necessary to obtain employment or advance within an occupation. These technical or occupational skills are generally based on standards developed or endorsed by employers. There are many different types of qualifying credentials offered or awarded by various types of organizations.

Educational Credentials
Educational credentials are typically termed diploma, certificate, or degree. Credit hours are building blocks for educational 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) constitute 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 post-secondary 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, or classes taken at the post-secondary level are beneficial to the youth and enhance the potential to be self-supporting; however, only those accredited degrees obtained after satisfactory completion of an organized program of study meet the definition of a certificate or credential.

Industry-Recognized Credentials
An industry-recognized 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. A variety of different public and private entities issue credentials including:

- State agencies, including workforce or education agencies;
- Professional, industry, or employer organizations;
- ETA’s Office of Apprenticeship or state apprenticeship agencies;
- Public regulatory agencies;
- Programs approved by Job Corps centers or the Department of Veterans Affairs; and
• Institutions of higher education, including community colleges and those
governed by an Indian tribe or tribes.

Additional information on what constitutes a credential within each of these categories can be
found in Training and Employment Guidance letter No. 15-10 at:

5. Construction Credentials within YouthBuild Programs. While there may be additional
credentials that qualify under the criteria described in TEGL 15-10, three construction
credentials 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: the National Center for Construction Education and Research (NCCER)
credential, the Home Builders Institute’s Pre-Apprenticeship Certificate Training (HBI-PACT)
credential, and the Emerald Cities Collaborative’s Multi-Craft Core Curriculum (MC3)
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 that curriculum is awarded. MC3 is
the only one of the three nationally-recognized construction certifications that does not utilize
modules but rather consists 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 15-10 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 15-10. 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 15-10. 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. Costs for activities found not to meet the credential definition of the YouthBuild program may become subject to disallowance.

At the state level, the workforce system can recognize specific programs of study and determine if they qualify as a credential under TEGL 15-10. Within the local workforce areas in each state, WIA youth providers may be of assistance to YouthBuild grantees in determining if a certificate offered for a particular completed program of study within their state qualifies as a credential.

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