

| | |
|---|---|
| EMPLOYMENT AND TRAINING ADMINISTRATION ADVISORY SYSTEM U.S. DEPARTMENT OF LABOR Washington, D.C. 20210 | CLASSIFICATION YouthBuild |
| | CORRESPONDENCE SYMBOL OWI-DYS |
| | DATE August 17, 2017 |

ADVISORY: TRAINING AND EMPLOYMENT GUIDANCE LETTER NO. 07-14, Change 1

TO: STATE WORKFORCE AGENCIES
STATE WORKFORCE LIAISONS
ALL YOUTHBUILD GRANTEES

FROM: ROSEMARY LAHASKY /s/
Deputy Assistant Secretary

SUBJECT: Updated Guidance for Implementing the Construction Plus Component of the YouthBuild Program, as authorized by the Workforce Innovation and Opportunity Act (WIOA)

1. **Purpose.** To provide further guidance for YouthBuild grantees implementing the Construction Plus component of the YouthBuild program, including a synopsis of what it entails, and to provide further clarity to workforce partners about the Construction Plus model.
2. **References.**
 - Workforce Innovation and Opportunity Act (WIOA), Pub. L. 113-128, <https://www.gpo.gov/fdsys/pkg/PLAW-113publ128/pdf/PLAW-113publ128.pdf>;
 - WIOA Regulations at 20 CFR Part 681 and 688, <https://www.gpo.gov/fdsys/pkg/FR-2016-08-19/pdf/2016-15975.pdf>;
 - Training and Employment Guidance Letter (TEGL) No. 15-10, “*Increasing Credential, Degree, and Certificate Attainment by Participants of the Public Workforce System*,” http://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=2967;
 - TEGL 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*,” https://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=3255;
 - CareerOneStop Toolkit, <https://www.careeronestop.org/Toolkit/toolkit.aspx>;
 - CareerOneStop Credentials Center, <https://www.careeronestop.org/credentials/>; and
 - Labor Market Information Central, <https://lmi.workforcegps.org/>.
3. **Background.** YouthBuild is a workforce development program that provides employment, education, pre-apprenticeship and apprenticeship opportunities, and leadership development training to disconnected youth between the ages of 16 and 24 who are high school dropouts. Those eligible may be a member of a low-income family, a foster care youth, an offender, a youth with a disability, a child of an incarcerated parent, or a migrant youth. The Workforce Innovation and Opportunity Act of 2014 (WIOA) reauthorized the YouthBuild program in

| | |
|----------------------------|--------------------------------------|
| RESCISSIONS None | EXPIRATION DATE Continuing |
|----------------------------|--------------------------------------|

the U.S. Department of Labor (DOL). WIOA authorizes grants for job training and educational activities for YouthBuild participants who, as part of their training, help build or rehabilitate housing for low-income or homeless individuals and families in their respective communities.

In the YouthBuild Final WIOA regulations, published as part 688 of the WIOA Final Rule on August 19, 2016, at 20 CFR part 688, DOL expanded the occupational skills training component of the YouthBuild program from solely construction skills training to include skills training in other in-demand jobs toward the goal of economic self-sufficiency. This guidance refers to these additional training industries as Construction Plus industries.

4. **What is Construction Plus?** Construction Plus refers to the inclusion of occupational skills training opportunities for YouthBuild participants in in-demand occupations other than construction. All DOL-funded YouthBuild programs are required to offer construction skills training to program participants. Whether Construction Plus training is provided consecutively or in tandem, the required training time of educational skills (50 percent of the time) and occupational skills (40 percent of the time) for each participant must be maintained, as identified in the Final Rule. Further, the participation timeframe must not exceed 24 months, regardless of the participant’s occupational skills training track, and must allow for a follow-up period of 12 months, as identified in the Final Rule.

In the DOL WIOA Final Rule at 20 CFR 688.120, YouthBuild programs funded by DOL are recognized as pre-apprenticeship programs. Grantees are expected to develop Construction Plus program models that align with pre-apprenticeship as described in part 681.480 of the Final Rule:

A pre-apprenticeship is a program designed to prepare individuals to enter and succeed in an apprenticeship program registered under the Act of August 16, 1937 (commonly known as the “National Apprenticeship Act”; 50 Stat.664, chapter 663; 29 U.S.C. 50 *et seq.*) (referred to in this part as a “registered apprenticeship” or “registered apprenticeship program”) and includes the following elements:

- 1) Training and curriculum that aligns with the skill needs of employers in the economy of the State or region involved;
- 2) Access to educational and career counseling and other supportive services, directly or indirectly;
- 3) Hands-on, meaningful learning activities that are connected to education and training activities, such as exploring career options, and understanding how the skills acquired through coursework can be applied toward a future career;
- 4) Opportunities to attain at least one industry-recognized credential; and
- 5) A partnership with one or more registered apprenticeship programs that assists in placing individuals who complete the pre-apprenticeship program in a registered apprenticeship program.

DOL expects grantees to develop the connection points described above and relationships and pathways that lead to employment and placements in apprenticeships. This expectation

applies to both the traditional YouthBuild model with construction skills training and the occupational skills training expanded under Construction Plus.

Some YouthBuild programs have strong partnerships and refer participants after exit to training partners who provide ongoing training. However, this is not Construction Plus and is instead a placement outcome. The goal of the Construction Plus model is to allow YouthBuild programs to build the capacity to provide training in in-demand industries for participants who are not interested in pursuing a construction career or in local areas where construction may not be as much of a growth industry as other fields. In order to be considered a Construction Plus program, YouthBuild grantees must be providing additional industry training, either directly or through a contract, in which DOL grant funds are also supporting some part of the additional training, such as the payment of stipends or subsidized wages during the required Construction Plus work experience or through payment to the training providers or staff. As with the construction training, the Construction Plus component focuses on attainment of industry-recognized certifications.

Construction Plus grantees must have demonstrated in their statements of work, through the use of local labor market data, that the proposed additional occupational skills trainings will lead to or prepare participants for employment in high-demand or locally in-demand jobs. Programs that propose to provide additional certifications that do not rise to the level of industry-recognized credentials described in Section 7 below, such as CPR or ServSafe, are not providing a Construction Plus component and cannot count those credentials as participant outcomes. Programs that are proposing to do specialized construction industry training, such as weatherization, solar paneling, and green building are also not doing Construction Plus, as these are still considered to be part of the construction industry and are therefore a component of the traditional YouthBuild program model.

5. **Labor Market Information Resources.** DOL has many labor market information resources available to grantees for assistance in identifying appropriate Construction Plus industries within their local communities; the CareerOneStop Toolkit Web page includes links to State Information pages (https://www.careerinfonet.org/select_state.asp?from=&next=lmi1&id=11&nodeid=13&socket=) which provide State resources on local labor market information. Additionally, grantees must use comprehensive curricula that, upon completion, lead to the attainment of industry-recognized credentials for program participants. The Labor Market Information Central Collection on WorkforceGPS (<https://lmi.workforcegps.org/>) provides valuable information on additional data sources useful for determining in-demand occupations and skills. Information on related credentials such as industry-recognized certifications and required State occupational licenses are available through the CareerOneStop Credentials Center (<http://www.careeronestop.org/credentials/>). This information helps in developing the required curricula and credentialing pathways.
6. **Implementing Construction Plus in Your YouthBuild Program.** YouthBuild grantees offering approved Construction Plus training must provide the same level of opportunity and benefit to Construction Plus participants that are available to participants in the core construction training. As with the core construction training, Construction Plus programs

must offer participants eligible education activities during at least 50 percent of the time and eligible workforce investment activities during at least 40 percent of the time during which they participate in the program. Up to ten percent of the time of participation may be used for leadership development and community service activities.

Like the core construction training, Construction Plus training must balance project-based learning and occupational skills training that prepare disconnected youth to gain placement into career pathways and/or further education or training. Construction Plus training must not be limited to classroom learning and must incorporate hands-on training similar to that offered in the core construction training. Additionally, Construction Plus must incorporate community service, youth leadership development, and work experience opportunities like those required in the core construction training.

Grantees have flexibility in determining how the program model includes Construction Plus industries. However, they are required to enroll a sufficient number of participants in the construction skills training component to build or renovate at least one unit of affordable housing for low-income individuals and families or transitional housing for homeless individuals during the grant period of performance. Youth may be divided between construction training and Construction Plus industry(ies) training, based on assessments of interest and skills match or all youth may first be placed in construction training for development of broadly-applicable professional skills, including soft skills (teamwork, leadership, communication) and hard skills (math, reading comprehension) before being further trained in the chosen Construction Plus industry. The grant period of performance and budget should be considered in designing the program model for the addition of Construction Plus.

All program performance measures are the same for the Construction Plus training(s). In particular, grantees should take into consideration the eligibility of YouthBuild participants for industry-recognized credentials and placement opportunities in selected Construction Plus field(s) (see Attachment, “*Considerations Guide for Credential Attainment for US Department of Labor (DOL) YouthBuild Grantees*,” for additional information).

- 7. What is an Industry-Recognized Credential?** Within the workforce system, the term credential refers to the attestation of qualification or competence issued to an individual by a third party with the relevant authority or competence to issue such a credential. There are many different types of industry-recognized credentials offered or awarded by various types of third-party organizations, such as an educational institution or an industry- or occupational-certifying organization. You can find more information on credentials in TEGL 10-16, Change 1 (https://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=3255) and in TEGL 15-10 (http://wdr.doleta.gov/directives/corr_doc.cfm?docn=2967).

For the purposes of credential attainment, WIOA distinguishes between a secondary school diploma (or its recognized equivalent) and postsecondary credentials. A recognized postsecondary credential is defined in TEGL 10-16, Change 1, as 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, as well as graduate degrees for purposes of the Vocational Rehabilitation program as required by section 103(a)(5) of the Rehabilitation Act of 1973, as amended by title IV of WIOA.

A recognized postsecondary credential is awarded in recognition of an individual's attainment of measurable technical or industry/occupational skills necessary to obtain employment or advance within an industry/occupation. These technical or industry/occupational skills generally are based on standards developed or endorsed by employers or industry associations. Neither certificates awarded by workforce development boards (WDBs), nor work readiness certificates, are included in this definition because neither type of certificate documents the measurable technical or industry/occupational skills necessary to gain employment or advance within an occupation. Likewise, such certificates must recognize technology or industry/occupational skills for the specific industry/occupation rather than general skills related to safety, hygiene, etc., even if such general skills certificates are broadly required to qualify for entry-level employment or advancement in employment.

A variety of different public and private entities issue recognized postsecondary credentials. Below is a list of the types of organizations and institutions that award recognized postsecondary credentials (not all credentials by these entities meet the definition of recognized postsecondary credential):

- 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. This includes community colleges, proprietary schools, and all other institutions of higher education that are eligible to participate in Federal student financial aid programs;
- 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.

TEGL 15-10 provides further attributes of qualifying credentials that are important in the workforce. In particular, TEGL 15-10 describes the importance of stackability and portability as factors to consider in identifying credentials that will assist with career pathways. The stackability and portability of credentials are important factors in determining whether to pursue a particular course of credentialing in the Construction Plus component. A credential is considered “stackable” when it is part of a sequence of credentials that can be accumulated over time to build an individual’s qualifications and help the individual to move along a career pathway or up a career ladder to different and potentially higher-paying jobs within the same industry. A credential is considered “portable” when it is recognized and accepted as verifying the qualifications of an individual in other settings, such as in other geographic areas, at other educational institutions, or by other industries or employers. To the extent possible, YouthBuild grantees that incorporate Construction Plus into their programs should strive to identify occupational skills training fields that will lead to both stackable and portable credentials within the chosen Construction Plus industries.

8. **Qualifying Credentials for the YouthBuild Program.** Qualifying credentials for YouthBuild must meet the definition of industry-recognized credentials provided above. A qualifying credential is one that provides a participant with the documentation of education and/or technical or occupational skills necessary to gain employment or advance within an occupation. These skills are measureable, based on industry standards, and developed or endorsed by employers. Only qualifying credentials may be reported as a performance indicator outcome under WIOA. The Credential Attainment performance indicator measures the number of participants in an education or training program (such as YouthBuild) who attain a diploma, a State-recognized high school equivalency credential, or an industry-recognized certificate during participation in or within one year of program exit. DOL does not recognize a diploma or State-recognized high school equivalency credential as a successful outcome unless such participants also attain a placement outcome within one year of exit.

A non-qualifying credential is any diploma or certificate that does not meet the definition in the previous section as it does not document individuals’ attainment of measurable technical or industry/occupational skills necessary to obtain employment or advance within an industry/occupation. DOL will not count non-qualifying credentials toward the “Certificate Attainment” performance indicator for WIOA in the YouthBuild web-based Management Information System. However, such credentials can be of value to participants as building blocks for educational and/or occupational success. Examples of non-qualifying credentials include: certificates awarded by Workforce Development Boards (WDBs); single skill certificates, such as CPR, First Aid, Occupational Safety and Health Administration (OSHA) Safety Training, and ServSafe; and work readiness certificates, such as the Jobs for America’s Graduates (JAG) Certificate of Mastery and the WorkKeys National Career Readiness Certificate (NCRC).

At the State level, the workforce system can recognize specific programs of study and determine if they meet the WIOA definition of a credential, as defined in TEGL 10-16, Change 1, and further detailed in TEGL 15-10. Local WIOA service providers may be of assistance to YouthBuild grantees in determining if a certificate offered for a particular completed program of study qualifies as a credential within their State. YouthBuild grantees should consult their assigned Federal Project Officers with any questions regarding qualifying credentials.

DOL developed a tool to help determine potential Construction Plus industries and the related credentials, particularly as they relate to the guidance in TEGL 15-10 on qualifying, stackable, and portable credentials. Attachment, “*Considerations Guide for Credential Attainment for US Department of Labor (DOL) YouthBuild Grantees*,” provides a series of framing questions that can help programs determine whether a Construction Plus credential pathway is the right fit for their YouthBuild program participants.

9. **Inquiries.** Questions on this TEGL may be addressed to the appropriate ETA regional office.
10. **Attachment.** *Considerations Guide for Credential Attainment for US Department of Labor (DOL) YouthBuild Grantees*