



LIFE. YOUR WAY.

Government of the District of Columbia  
Department on Disability Services

| <b>STANDARD OPERATING PROTOCOL</b>  |                                     |
|---|-------------------------------------|
| Subject: Documentation of Credential Attainment and Measurable Skill Gains in the Case Record   | SOP Number: 2021-RSA-CAMSG - SOP-01 |
| Responsible Program or Office:<br>Rehabilitation Services Administration  | Effective Date: August 16, 2021     |
|   | Number of Pages: 6                  |
| Cross References, Related Policies and Procedures, and Related Documents:<br>RSA Post-Secondary Education and Training Policy (2015-POSTSEC-POL01) and Procedure (2015-RSA-POSTSEC-PR01); Section 116 of the Workforce Innovation and Opportunity Act, 29 U.S.C. § 3141; Rehabilitation Services Administration (RSA) Technical Assistance Circular RSA-TAC-17-01; RSA Technical Assistance Circular RSA-TAC-19-01; RSA Credential Attainment and Measurable Skill Gains Policy 2020-RSA-CAMSG-POL-01 |                                     |

**1. PURPOSE**

Vocational Rehabilitation programs across the nation are reviewing their internal processes to ensure that all reporting relating to case records aligns with revised performance accountability standards. While there are six primary areas of performance that state agencies are required to report in accordance with The Rehabilitation Act of 1973( 29 U.S.C. § 701 *et seq.*) (Rehabilitation Act) as amended by section 116 of the Workforce Innovation and Opportunity Act (WIOA) (29 U.S.C. § 3141) with regard to reporting standards, this guidance refers to all applicable processes related to Measurable Skill Gains (MSGs) and Credential Attainment.

This procedure serves as guidance on how to appropriately account for Measurable Skill Gains and Credential Attainment as participants in education and training programs progress towards identified objectives and goals as stated in each person’s Individualized Plan for Employment (IPE).

**2. RESPONSIBLE STAFF**



LIFE. YOUR WAY.

## Government of the District of Columbia Department on Disability Services

---

3. Responsible staff include Vocational Rehabilitation (VR) Specialists, Rehabilitation Assistants (RAs), VR Supervisors and Program Managers, the DCRSA Deputy Director, the Quality Assurance and Performance Management Administration (QAPMA) Deputy Director, and the QAPMA Performance Management Administrator and Performance Management Staff. **DEFINITIONS**
- A. Measurable Skill Gains: The percentage of program participants who, during a program year, are in an education or training program that leads to a recognized postsecondary credential or employment and who are achieving measurable skill gains, defined as documented academic, technical, occupational, or other forms of progress, towards such a credential or employment.
- B. Documented Progress: Depending on the type of education or training program, documented progress is defined as one of the following:
1. Documented achievement of at least one educational functioning level of a participant who is receiving instruction below the postsecondary education level;
  2. Documented attainment of a secondary school diploma or its recognized equivalent;
  3. Secondary or postsecondary transcript or report card for a sufficient number of credit hours that shows a participant is meeting DCRSA's academic standards;
  4. Satisfactory or better progress report, towards established milestones, such as completion of on-the-job training (OJT) or completion of one year of an apprenticeship program or similar milestones, from an employer or training provider; or
  5. Successful passage of an exam that is required for securing an entry-level position in a particular occupation or progress in attaining technical or occupational skills as evidenced by trade-related benchmarks such as knowledge-based exams.
- C. Credential Attainment is the percentage of those participants enrolled in an education or training program (excluding those in OJT and/or customized training) who attained a recognized postsecondary credential or a secondary

school diploma, or its recognized equivalent, during participation in, or within one year after exit from, the program.

A participant who has attained a secondary school diploma or its recognized equivalent is included in the percentage of participants who have attained a secondary school diploma or its recognized equivalent only if the participant is also employed or enrolled in an education or training program leading to a recognized postsecondary credential within one year after exit from the program.

#### **4. PROTOCOLS**

##### **A. Documenting Measurable Skill Gains: Applicable Participants**

Federal reporting requirements identify specific data elements that must be included in a case record in order for MSGs and Credential Attainment to be tallied accurately in quarterly and annual performance reports. To ensure that the reports identify all students and trainees who have achieved MSGs and Credential Attainment, the IPE must identify a need for training services, and the person must be enrolled in a credentialed education or training program. The case record must include documentation of all of the following:

1. Case Eligibility – All case records must include dates and supporting documentation that identifies the:
  - a. Date of Application; and the
  - b. Date of Eligibility Determination.
2. Approved, fully executed IPE – All case records must include dates and supporting documentation that identifies the:
  - a. Start Date of the Initial IPE;
  - b. The need for an training service as appropriate.
3. Service Initiation – All case records must include dates and supporting documentation (when applicable) that identifies the:
  - a. Start Date of Initial VR Service (which can be on or after the Initial IPE start date).



LIFE. YOUR WAY.

## Government of the District of Columbia Department on Disability Services

---

4. Exit Date – All case records must include dates and supporting documentation (when applicable) that identifies the:
  - a. Exit Date from VR Services.

### **B. Documenting Measurable Skill Gains and Credential Attainment: Supporting Documentation**

For those applicable participants enrolled in an education or training program, case records must be updated regularly as documentation of progress becomes available. The data elements necessary for accurately reporting an MSG or Credential Attainment include the start date of the education program or training, the program completion date, and the type of skill gained with supporting documentation:

1. Program Start Date – All case records must include dates and supporting documentation (when appropriate) that identify the:
  - a. Start Date of the approved education program or training;
  - b. Enrollment date for Credential Attainment; and
  - c. Enrollment date for MSG.
2. Program Completion Date – All case records must include dates and supporting documentation (when appropriate) that identifies the:
  - a. Date of approved education program or training completion, or
  - b. Date of disenrollment from the education program or training.
3. Documented Skill Gained – All case records must include dates and supporting documentation (when appropriate) that identify when one of the following types of skills are gained:
  - a. Change in Educational Functional Level (EFL);
  - b. Secondary school diploma or its recognized equivalent;
  - c. Secondary or Postsecondary Transcript/Report Card indicating academic progress consistent with academic standards;
  - d. Training Milestone (satisfactory or better progress report toward established milestone); or
  - e. Skills Progression (successful passage of a required exam).



LIFE. YOUR WAY.

## Government of the District of Columbia Department on Disability Services

---

During quarterly WIOA reporting, VR counselors must compile all documentation that supports any MSG for the clients on their caseload. This documentation must be scanned into the case file and titled: “MSG: Name of MSG Document (*see* III(a)-(e), above).” It is vital to use this naming convention for MSGs so that the VR program can easily find the supporting documentation that corresponds to the MSG reported in the WIOA quarterly reports. Once supporting documentation is uploaded into the case file, the VR counselor must report this information in their quarterly WIOA reporting in the following three areas of the “IPE WIOA Documentation” form in System 7:

1. Education;
2. WIOA Education Level; and
3. Dates of Education Achievement.

### **C. Best Practices for Record Management**

On a quarterly basis, case records are reviewed in preparation for the submission of federally mandated reports including the RSA-911 Case Service Report. To ensure that all records are submitted accurately and timely, quality assurance checks are performed and errors are returned when there are discrepancies in the required data format. To assist in the proper completion of MSG record keeping, the following errors are commonly found during the quality assurance checks:

1. Date Enrolled in Program Participation in an Education or Training Program Leading to a Recognized Postsecondary Credential or Employment.
  - a. Date of VR application is later than the start/enrollment date of the training program
    - i. Counselors should ensure the date of the application occurs earlier than the start/enrollment date of the training. If the person was enrolled in a training program at the time of the application being submitted, then the application date and the training start date should be identical.
2. Date of Most Recent MSG: Secondary or Postsecondary
  - a. Date enrolled in training program leading to a recognized postsecondary credential or employment is left blank.



LIFE. YOUR WAY.

## Government of the District of Columbia Department on Disability Services

---

- i. If a date has been entered for when an MSG was obtained, then the enrolled date cannot be left blank.

In addition to the quality assurance checks that are performed for any federally mandated reports, Quality Assurance Monitors (in conjunction with VR supervisors) perform periodic case record reviews to confirm the presence of the required documentation that supports the progress noted in the record. Three questions have been added to the case review tool to identify any deficiencies within the data collection for MSGs (if you have questions about where this information should be entered in the case record, please consult your supervisor):

1. Start date of the approved education program or training is on file.
  - a. Supporting Documentation in Casefile? Y/N/NA.
2. Completion date of the approved education program or training is on file.
  - a. Supporting Documentation in Casefile? Y/N/NA.
3. Date of at least one measurable skill gained through participation in approved education program or training is on file.
  - a. Supporting Documentation in Casefile? Y/N/NA.

Quality assurance findings from these regular case reviews inform discussion between staff and supervisors for the purpose of performance remediation if/when there are repeat occurrences of missing or incomplete data. The findings also show when the case management system needs to be updated because limitations of the system result in a lack of accurate documentation. Lastly, the VR program will review this data to determine the training and technical assistance needs of the VR Staff.