



**Division of Workforce
Development and Adult Learning
(DWDAL)**
Policy Issuance



PI 2026-13 Measurable Skill Gains | October 28, 2026

TO	Division of Workforce Development and Adult Learning (DWDAL) staff, Division of Rehabilitation Services (DORS) Staff, and Local Workforce Development Area (Local Area) Directors	
FROM	DWDAL, Maryland Department of Labor (MD Labor)	
SUBJECT	DWDAL Measurable Skill Gains (MSG) Policy	
PURPOSE	To provide guidance on Measurable Skill Gains for DORS and MD Labor Workforce and Adult Education programs.	
ACTION	Local Area Directors, American Job Center (AJC) Reemployment Program Directors, adult education program administrators, DORS program staff, and central office managers will ensure all employees, service providers, and vendors are aware of and receive copies of this policy. DWDAL policies are available on the MD Labor website .	
EXPIRATION	Until Cancelled.	
QUESTIONS	<p>Perketer Tucker Director, Office of Adult Education and Literacy Services DWDAL, MD Labor 410.767.4150 perketer.tucker@maryland.gov</p> <p>Lauren Gilwee Director, Policy DWDAL, MD Labor 410.746.2124 laurene.gilwee@maryland.gov</p>	<p>Melissa Volpe Acting Director Office of Workforce Development DWDAL, MD Labor 410.767.2995 melissa.volpe@maryland.gov</p> <p>Patrick Peto Program Manager Division of Rehabilitation Services, Maryland State Department of Education 410.554.9536 patrick.peto@maryland.gov</p>
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EXECUTIVE SUMMARY

The Maryland Department of Labor (MD Labor)'s Division of Workforce Development and Adult Learning (DWDAL) oversees Maryland's implementation of workforce development programs authorized by the Federal Workforce Innovation and Opportunity Act (WIOA), including several of WIOA's core programs, including the Adult, Dislocated Worker, and Youth program (Title I), the Adult Education and Family Literacy Act (AEFLA) program (Title II), and the Vocational Rehabilitation program (Title IV).

These programs must regularly report on their performance. Measurable Skill Gains (MSG) is a performance indicator that documents the percentage of program participants who are in an education or training program and are achieving specific benchmarks, defined as documented academic, technical, occupational, or other forms of progress, towards a recognized postsecondary credential or employment.

This policy issuance outlines the five types of MSGs and the documentation programs must submit to document their participants' MSGs, along with the reporting guidelines for programs.

CANCELLATIONS

The following is hereby cancelled and replaced by this policy issuance:

- Policy Issuance 2023-01 – “Measurable Skill Gains,” dated January 10, 2023.

Archived policies are available at: <http://www.labor.maryland.gov/employment/wifi/>.

GENERAL INFORMATION

WORKFORCE INNOVATION & OPPORTUNITY ACT

The Workforce Innovation and Opportunity Act (WIOA) was signed into law on July 22, 2014, and went into effect July 1, 2015. WIOA supersedes the Workforce Investment Act of 1998 and amends the Adult Education and Family Literacy Act, the Wagner-Peyser Act, and the Rehabilitation Act of 1973. To help both businesses and job seekers meet their needs, the workforce system established under WIOA is integrated by design. WIOA envisions connecting businesses with job seekers through meaningful partnerships among workforce, education, human services, and economic development entities to ensure optimum results and leveraging of resources. The law addresses the needs of job seekers by establishing a workforce system that helps them access employment, education, training, and support services to succeed in the labor market. Through the American Job Centers (AJCs), WIOA works to address employer demands by matching them to the skilled workers they need to compete in the global economy.

Additionally, WIOA provides a historic opportunity to align performance-related definitions, streamline performance indicators, integrate reporting, and ensure comparable data collection and reporting across the workforce system. Measurable Skill Gains (MSG) is a performance measure that can be utilized by 5 of WIOA's core programs: the Adult, Dislocated Worker, and Youth program (Title I), the Adult Education and Family Literacy Act (AEFLA) program (Title II), and the Vocational Rehabilitation program (Title IV).

MEASURABLE SKILL GAINS (MSG)

MSG is a WIOA performance indicator used to measure interim progress of participants enrolled in education or training services for a specified reporting period under WIOA. More specifically, it is a measure that documents the percentage of program participants who are in an education or training program and are achieving specific benchmarks, defined as documented academic, technical, occupational, or other forms of progress, towards a recognized postsecondary credential or employment.

Depending on the type of education or training programs, MSG progress can be defined as any of the following¹:

1. **Type 1:** Documented achievement of at least one *educational functioning level* of a participant who is receiving instruction below the postsecondary education level. MSG Type 1 has several subtypes:
 - a. Pre- and post-testing: Documented achievement of at least one educational functioning level in reading, writing, speaking, and listening and functional areas, as measured by an NRS-approved assessment.
 - b. Earning enough Carnegie Units or credits to move from ABE level 5 to ABE level 6, according to State rule. This rule is **not** used in Maryland.
 - c. For participants who are enrolled in a program below the postsecondary level, enrollment in a State-recognized postsecondary education or training during the program year. A program below the postsecondary level applies to participants enrolled in a basic education program.
 - d. Passage of a subtest on a State-recognized high school equivalency examination.²

¹ For more information, please refer to [TEGL 10-16, Change 3](#).

² At the time of this writing, the recognized High School Equivalency test in Maryland is the GED® Examination.

2. **Type 2:** Documented attainment of a *secondary school diploma* or its recognized equivalent.
3. **Type 3:** Secondary or postsecondary transcript or report card for a *sufficient number of credit hours* that shows a participant is meeting the State unit's academic standards.
4. **Type 4:** Satisfactory or better *progress report, towards established milestones*, such as completion of on-the-job training (OJT)³ or completion of one year of an apprenticeship program or similar milestones, from an employer or training provider who is providing training.
5. **Type 5:** Successful *passage of an exam* that is required for a particular occupation or progress in *attaining technical or occupational skills* as evidenced by trade-related benchmarks such as knowledge-based exams.

³ Also known as on-the-job learning, or OJL.

MEASURABLE SKILL GAINS IN MARYLAND

MSGs are utilized across Maryland’s workforce system, including for Title I, Title II, and Title IV. The following table provides a breakdown of how each MSG reporting measure relates to the five MSG types.⁴

MSG Type	Data Element ⁵	Description	Acceptable Documentation
Type 1 - Documented achievement of at least one educational functioning level (EFL) of a participant who is receiving instruction below the postsecondary education level.	Date of Most Recent Measurable Skill Gains: EFL	<p>The most recent date (during the reporting period) the participant achieved at least one EFL. EFL gain may be documented in one of the following ways:</p> <p>a) by comparing a participant’s initial EFL as measured by a pre-test with the participant’s EFL as measured by a participant’s post-test; or</p> <p>b) for States that offer secondary school programs that lead to a secondary school diploma or its recognized equivalent, an EFL gain may be measured through the awarding of credits or Carnegie units; or</p> <p>c) States may report an EFL gain for participants who are enrolled in a program below the postsecondary level and who enroll in State-recognized postsecondary education or training during the program year. A program below the postsecondary level applies to participants enrolled in a basic education program⁶; or</p> <p>d) States may report an EFL gain for participants who pass a subtest on a State-recognized</p>	<p>One of the following:</p> <ul style="list-style-type: none"> • Pre- and post-test results measuring EFL gain; • Adult High School transcript showing EFL gain through the awarding of credits or Carnegie units; or, • Postsecondary education or training enrollment determined through data match, survey documentation, or program notes.

⁴ For more information, please review TEGL 23-19, Change II, Attachment II.

⁵ This column refers to a single instance of a MSG. An individual can receive multiple MSGs for each data element/MSG type.

⁶ From OCTAE Program Memorandum 17-2, “[Performance Accountability Guidance for Workforce Innovation and Opportunity Act \(WIOA\) Core Programs.](#)”

MSG Type	Data Element ⁵	Description	Acceptable Documentation
		high school equivalency examination. ⁷	
Type 2 - Documented attainment of a secondary school diploma or its recognized equivalent.	Date Attained Recognized credential	The date on which the participant attained a recognized credential.	<p>One of the following:</p> <ul style="list-style-type: none"> · Data match; · Copy of credential; · Copy of school record; · Follow-up survey from program participants; or · Case notes documenting information obtained from education or training provider. <p>(For RSA-911 purposes, documentation is required for credentials earned after program participation begins.)</p>
	Type of Recognized Credential	The type of recognized diploma, degree, or a credential consisting of an industry-recognized certificate or certification, a certificate of completion of a Registered Apprenticeship, a license recognized by the State or Federal Government, or an associate or baccalaureate degree attained by the participant who received education or training services.	<p>One of the following:</p> <ul style="list-style-type: none"> · Data match; · Copy of credential; · Copy of school record; · Follow-up survey from program participants; or, · Case notes documenting information obtained from education or training provider.
Type 3 - Secondary or postsecondary transcript or report card for a sufficient number of credit hours that shows a participant is meeting the State unit's academic standards.	Date of Most Recent Measurable Skill Gains: Postsecondary Transcript/ Report Card	The most recent date (during the reporting period) of the participant's transcript or report card for postsecondary education who complete a minimum of 12 hours per semester, or for part time students a total of at least 12 credit hours over the course of two completed consecutive semesters during the program year, that shows a participant is	<p>One of the following:</p> <ul style="list-style-type: none"> · Transcript; or, · Report card.

⁷ From Participant Individual Record Layout ETA-9172 (DOL only), available [here](#).

MSG Type	Data Element ⁵	Description	Acceptable Documentation
		meeting the State unit's academic standards.	
	Date of Most Recent Measurable Skill Gains: Secondary Transcript/ Report Card	The most recent date (during the reporting period) of the participant's transcript or report card for secondary education for one semester showing that the participant is meeting the State unit's academic standards.	One of the following: · Transcript; or, · Report card.
Type 4 - Satisfactory or better progress report, towards established milestones, such as completion of OJT or completion of one year of an Apprenticeship program or similar milestones, from an employer or training provider who is providing training.	Date of Most Recent Measurable Skill Gains: Training Milestone	The most recent date (during the reporting period) that the participant had a satisfactory or better progress report towards established milestones from an employer or from a training provider who is providing training (e.g. completion of OJT, completion of one year of a Registered Apprenticeship program, etc.).	One of the following: · Documentation of participation in an OJT or Registered Apprenticeship; · Contract and/or evaluation from employer; or, · Contract and/or evaluation from a training provider.
Type 5 - Successful passage of an exam that is required for a particular occupation or progress in attaining technical or occupational skills as evidenced	Date of Most Recent Measurable Skill Gains: Skills Progression	The most recent date (during the reporting period) the participant successfully passed an exam that is required for a particular occupation, or progress in attaining technical or occupational skills as evidenced by trade-related benchmarks such as knowledge-based exams.	One of the following: · Results of knowledge-based exam or certification of completion; · Documentation demonstrating progress in attaining technical or occupational skills;

MSG Type	Data Element ⁵	Description	Acceptable Documentation
by trade-related benchmarks, such as knowledge-based exams.			<ul style="list-style-type: none"> · Documentation from training provider or employer; or, · Copy of a credential that is required for a particular occupation and only is earned after the passage of an exam.

Staff must record each MSG received as they occur for every participant. Examples/scenarios that provide specific, real-world examples for how to categorize MSGs can be found in ***Attachment A – Real World Measurable Skill Gains Examples***.⁸

MSG TYPE 4

MD Labor encourages flexibility, within federal guidelines, for all MSG Types. In particular, MSG Type 4 allows programs to innovatively utilize evaluations from employers or training providers to document progress towards established milestones. These benchmarks must be **predetermined**.

MD Labor provides an optional template for Title II providers for creating, tracking, and managing completion of MSG Type 4 for participants. If using the template, providers must create it in conjunction with employers and/or training providers, as well as the State, to ensure that the milestones/progressions documented are allowable. Entities interested in receiving the template can contact Doug Weimer at douglas.weimer@maryland.gov.

Title I and Title IV are encouraged to create their own templates for use within their programming.

⁸ Additional examples for reporting on MSGs for Title II can be found here: <https://nrsweb.org/policy-data/Resources-for-Reporting>.

REPORTING

TEGL 7-18, TEGL 23-19 (Changes 1 and 2), Program Memorandum OCTAE 19-1, RSA-TAC 19-01, and DWDAL's *Data Validation* policy⁹ provide the documentation requirements for all programs reporting MSGs. For Title II providers, a reporting guide can be found online at <https://labor.maryland.gov/lwis/>.

PARTICIPANT CO-ENROLLMENT

Participants co-enrolled in Title I Adult, Dislocated Worker, and/or Youth programs that receive an MSG from one program receive that MSG for all Title I programs they are co-enrolled in. Title I staff must input the MSG into MWE, where it will automatically report for all the participant's Title I co-enrolled programs.

Participants co-enrolled in Title I and Title II programming that receive an MSG from one program also receive that MSG for the program they are co-enrolled in. MD Labor requires Title I and Title II providers to communicate with each other so that program staff know when a participant receives a MSG and can input it into their respective systems. Title I staff must report the MSG in MWE and Title II staff must report the MSG in the Literacy, Adult and Community Education System (LACES) database.

Examples of communication methods between co-enrolled programs may include, but are not limited to:

1. Formal agreements;
2. Use of shared databases, such as Google Workspace; and/or,
3. Regularly scheduled check-in calls.

⁹ DWDAL policy issuances can be found on MD Labor's website: <https://labor.maryland.gov/employment/mpi/>.

MONITORING AND RECORD RETENTION

MONITORING

The State may monitor reporting on MSGs for Title I and Title II providers as part of its standard data validation and/or fiscal and programmatic monitoring to ensure that policies are being followed and expectations are being met. Monitoring may include desk and/or on-site monitoring.¹⁰

Title IV providers may be monitored by the Rehabilitation Services Administration (RSA) as part of their fiscal and/or programmatic monitoring.

RECORD RETENTION

The Federal records retention policy on results requires documentation processes for maintaining records, which must include: copies of worksheets on data elements or records reviewed, frozen quarterly wage records for wage record matching used for reporting outcomes, trends in common data accuracy issues, error rates, and corrective action efforts made after data validation reviews. DWDAL requires folders and documentation be maintained for a period of at least three years¹¹ following the exit date or more if undergoing a legal review.¹²

All records, both electronic and physical, must be maintained in accordance with TEGL 39-11, “Guidance on the Handling and Protection of Personally Identifiable Information (PII),” as well as DWDAL’s policy concerning security, to maintain confidentiality and protect PII.¹³ PII is participant-level and employee data that either by itself or combined with other data can link to a specific individual or identity.

¹⁰ DWDAL’s Policy Issuance on monitoring can be found here: <http://www.labor.maryland.gov/employment/mpi/>.

¹¹ 2 CFR 200.334, “[Retention requirements for records](#).”

¹² Local Areas may create their own record retention policies and procedures as long as they are in compliance with federal requirements.

¹³ DWDAL’s Policy Issuance on privacy and data security can be found here: <http://www.labor.maryland.gov/employment/mpi/>.

FAIR PRACTICES AND ACCESSIBILITY

It is MD Labor's policy that all persons have equal opportunity and access to services and facilities without regard to race, religion, color, sex (including pregnancy, childbirth and related medical conditions, transgender status, gender identity, and sexual orientation), marital status, genetic information, age, national origin or ancestry (including Limited English Proficiency), disability, veteran status, political affiliation or belief, for the beneficiaries, applicants, and participants only, on the basis of citizenship status, or participation in a program or activity that receives financial assistance under Title I of WIOA. Interested parties may refer to MD Labor's Nondiscrimination Plan¹⁴ and Language Access Plan¹⁵ for more information on accommodations and services.

¹⁴ MD Labor's Nondiscrimination Plan is available at the following link:

<http://www.labor.maryland.gov/employment/ndp/>.

¹⁵ The DWDAL and Division of Unemployment Insurance Language Access Plan is available at the following link: <http://www.labor.maryland.gov/employment/wioa-access.pdf>.

REFERENCES

LAW

- [Workforce Innovation and Opportunity Act](#) (WIOA), 29 U.S.C. § 3101 et. seq (2015); and,
- [Government Performance and Results Act](#) (GPRA) of 1993 (Public Law 103-62; 107 Stat.285);

REGULATION

- [Joint Rule for Unified and Combined State Plans, Performance Accountability, and the One-Stop System Joint Provisions](#), Final Rule (WIOA Joint Final Rule) published at 81 FR55792 (Aug. 19, 2016);
- [Employment and Training Administration, Workforce Innovation and Opportunity Act](#), Final Rule (WIOA DOL Final Rule) published at 81 FR 56071 (Aug. 19, 2016);
- 2 CFR §§[200](#), [683](#) and [2900](#) – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards;
- 20 CFR Part 651, “[General Provisions Governing the Wagner-Peyser Act Employment Service](#);”
- 29 CFR § 97.42, “[Retention and Access Requirements for Records](#);”
- 29 CFR Part 38, “[Implementation of the Nondiscrimination and Equal Opportunity Provisions of the Workforce Innovation and Opportunity Act](#),” and,
- 34 CFR § 463.240, “[What are the requirements for data validation of State annual performance reports?](#)”

USDOL GUIDANCE

- TEGL 11-19, Change 2, “[Negotiations and Sanctions Guidance for the Workforce Innovation and Opportunity Act \(WIOA\) Core Programs](#),” dated January 6, 2025;
- TEGL 23-19, Change 2, “[Revisions to Training and Employment Guidance Letter \(TEGL\) 23-19, Change 1, Guidance for Validating Required Performance Data Submitted by Grant Recipients of U.S. Department of Labor \(DOL\) Workforce Programs](#),” dated May 12, 2023.
- TEGL 23-19, Change 1, “[Guidance for Validating Required Performance Data Submitted by Grant Recipients of U.S. Department of Labor \(DOL\) Workforce Programs](#),” dated October 25, 2022;
- TEGL 10-16 Change 3, “[Performance Accountability Guidance for Workforce Innovation and Opportunity Act \(WIOA\) Core Programs](#),” dated September 15, 2022;
- TEGL 21-16, Change 1, “[Change 1 to Training and Employment Guidance Letter \(TEGL\) 21-16 Third Workforce Innovation and Opportunity Act \(WIOA\) Title I Youth Formula Program Guidance](#),” dated July 30, 2021;
- TEGL 14-18, “[Aligning Performance Accountability Reporting, Definitions, and Policies Across Workforce Employment and Training Programs Administered by the U.S. Department of Labor \(DOL\)](#),” dated March 25, 2019;
- TEGL 7-18, “[Guidance for Validating Jointly Required Performance Data Submitted under the Workforce Innovation and Opportunity Act \(WIOA\)](#),” dated December 19, 2018;
- TEGL 5-18, “[Workforce Innovation and Opportunity Act \(WIOA\) Annual Statewide Performance Report Narrative](#),” dated November 7, 2018;

- TEGL 26-16, “[Guidance on the use of Supplemental Wage Information to implement the Performance Accountability Requirements under the Workforce Innovation and Opportunity Act](#),” dated June 1, 2017;
- TEGL 21-16, “[Third Workforce Innovation and Opportunity Act \(WIOA\) Title I Youth Formula Program Guidance](#),” dated March 2, 2017;
- TEGL 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](#),” dated March 1, 2017; and
- TEGL 39-11, “[Guidance on the Handling and Protection of Personally Identifiable Information \(PII\)](#),” dated June 28, 2012.

U.S. DEPARTMENT OF EDUCATION GUIDANCE

- OCTAE Program Memorandum 17-2, “[Performance Accountability Guidance for Workforce Innovation and Opportunity Act \(WIOA\) Core Programs](#),” dated June 11, 2024;
- DCL 23-04, “[Revised Case Service Report \(RSA-911\)](#),” dated September 28, 2023;
- RSA-PD-19-03, “[Instructions for the Completion of the Case Service Report \(RSA-911\) for the State Vocational Rehabilitation Services Program and the State Supported Employment Services Program](#),” dated May 6, 2019;
- Program Memorandum OCTAE 19-1, “[Guidance for Validating Jointly Required Performance Data Submitted under the Workforce Innovation and Opportunity Act \(WIOA\)](#),” dated December 19, 2018; and
- RSA-TAC-19-01, “[Guidance for Validating Jointly Required Performance Data Submitted under the Workforce Innovation and Opportunity Act \(WIOA\)](#),” dated December 19, 2018.

OTHER RESOURCES

- [Case Service Report \(RSA-911\) – PD-19-03 Implementation Checklist](#)
- [DWDAL Policy Issuance Page](#);
- [Maryland WIOA Combined State Plan](#);
- [MSG Scenarios Video Guide](#);
- [MSG Technical Assistance Webinar Recording](#);
- [Credential Attainment Guide](#); and,
- [Workforce Innovation and Opportunity Act \(WIOA\) Common Performance Reporting](#) (OMB No. 1205-0526).

ATTACHMENTS

- Attachment A – Real World Measurable Skill Gains Examples

Real World Measurable Skill Gains Examples

Examples of MSGs

Successful completion of a pre-apprenticeship that is approved by MD Labor and the Maryland Apprenticeship and Training Council would count as a MSG.

Interchangeable MSGs

There are a variety of situations where a MSG could be considered both a training milestone (Type 4) and a skills progression (Type 5). These include, but are not limited to:

1. Participant that completes the Commercial Driver's License (CDL) practical portion and has documentation (CDL training typically has continuous exams after each module).
2. Participant that completes the Certified Nursing Assistant (CNA) training. In addition, because a participant must complete CPR and First aid before they complete CNA training, these also each qualify as a milestone or progression.
 - a. Note that both CPR and First Aid only qualify as a MSG when part of a larger training program leading to an industry-recognized credential, such as an Integrated Education and Training program.
3. In a training that is broken up into multiple sections (e.g. CompTIA Fundamentals, or CompTIA + exam prep), completion of any training components, depending on the significance, could be a MSG.

For all the above examples, MSGs should be determined in conjunction with an employer or training provider, as well as the State when applicable.

When reporting, programs must choose whether they wish to report the MSG under Type 4 or Type 5. A single MSG cannot be submitted under both categories.

Each earned MSG and credential should be reported.

MSGs vs. Credentials

WIOA defines a "recognized post-secondary credential" 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.

To clarify, a successful course completion would count as a MSG, whereas an earned license would count as a credential.

MD Labor's monitoring unit has noted that they regularly encounter issues between determining what is considered an MSG versus a credential, particularly in terms of submitting the required documentation.

An example of this is:

1. A provider submitting the completion of a CDL-A class certification from a training vendor as a credential. The completion of this class would actually be a MSG, not a credential. The CDL-A license itself would qualify as the credential.
2. If a Title II learner earns their High School Diploma in November, completes the CNA/GNA course of study in April, and receives their CNA/GNA license in May, they would receive a Type 2 MSG for the High School Diploma, a Type 5 MSG for the course completion, and report on credential attainment for the CNA/GNA license received. All MSGs must be reported as they occur.