

CREDENTIAL ATTAINMENT &

MEASURABLE SKILLS GAIN PROCEDURE

Directive #: WDD 20-41 Supersedes: NA

PURPOSE

This policy provides OEWD funded agencies guidance on obtaining Credential Attainment and Measurable Skills Gain performance outcomes as required under the Workforce Innovation and Opportunity Act (WIOA) and Competitive Grants (if applicable).

These performance outcomes are required when enrolling in an OEWD funded program for contracted services stipulated in each of the agency's subcontract and measured against the negotiated goals and actual performance outcomes.

POLICY AND PROCEDURES

Performance Indicators

OEWD strives to ensure educational and training programs are accountable to participants and tax-payers. Under OEWD and this procedure providers will report on the following indicators of performance:

- 1. Credential Attainment (CA)
- 2. Measurable Skill Gains (MSG)

Note – All performance measures are quantified by the data that is entered into OEWD data systems. Therefore, it is mandatory that all performance related data (e.g. activity codes, MSGs, credentials, etc.) are entered accurately.

1. Credential Attainment (CA)

Adult and out-of-school youth participants enrolled in education or occupational skills training programs (excluding On-the-Job Training [OJT] or customized training) must attain a recognized industry or postsecondary credential within one year of program exit.

In-school youth participants enrolled in secondary education who has attained a secondary school diploma, or its recognized equivalent during participation or within one year of program exit, must also enter into postsecondary education or obtain unsubsidized employment within one year of program exit in order to obtain Credential Attainment.

The following are examples of credentials/certificates that **are** recognized credentials:

Secondary school diploma or recognized equivalent

- Associate degree
- Bachelor's degree
- Occupational licensure (e.g. Certified Nursing Assistant license)
- Occupational certificate, including Registered Apprenticeship and Career and Technical Education educational certificates
- Occupational certification (e.g. Automotive Service Excellence certification)
- Other recognized certificates of industry/occupational skills completion sufficient to qualify for entry-level or advancement in employment
- Other industry-recognized credentials

The following are examples of credentials/certificates that are **NOT** recognized postsecondary credentials:

- Occupational Safety and Health Administration 10-hour course on job-related common safety and health hazards (OSHA 10)
- Microsoft Office, Customer Service, and/or General Office
- National Career Readiness Certification
- National Retail Federation Credentials
- ServSafe Food Handler's Certification
- Cardio Pulmonary Resuscitation (CPR) Certification
- Certificates awarded by Local Workforce Development Boards and work readiness certificates

See Appendix II for more information on assessing whether an industry-recognized credential meets the standards of the credential attainment performance indicator.

See Appendix IV for instructions on how to use LMID's Occupation Tool to verify credentials for the purposes of the credential attainment performance indicator.

Credential Attainment Activity Codes

Participation in any of the following OEWD activities or activity codes will result in activating inclusion in the calculation of *Credential Attainment*:

A. WIOA Adult/Dislocated Worker Programs

- 300 Occupational Skills Training (approved ETPL provider)
- 304 Customized Training
- 305 Skill Upgrading and Retraining
- 313 Placed In State or Local Training Non-WIOA or Competitive Grants (if applicable)
- 324 Adult Education with Training Services
- 325 Apprenticeship Training
- 328 Occupational Skills Training Non-ETPL provider or Competitive Grants (if applicable)

B. Youth Program

- 415 Enrolled in Alternative Secondary Education
- 416 Occupational Skills Training (approved ETPL provider)
- 418 Adult Education (GED)
- 430 Occupational Skills Training (Statewide Youth Provider List)
- 432 Enrolled in Apprenticeship Training

2. Measurable Skill Gains (MSG)

Adult and youth participants enrolled in education or occupational skills training program (including On-the-Job Training [OJT] or customized training) must attain a MSG during the program year and prior to exit. MSGs track a participant's *interim* progress; therefore, it is intended to capture important pathway progressions based upon "real time." It is NOT an exit-based performance indicator.

The five types of measurable skill gains require documentation contingent upon the type of training or education in which the participant is enrolled. Participants may fall into one or more of the MSG types. If a participant falls into more than one MSG type, subrecipient staff have the flexibility to choose which type to report. Subrecipients can report on all MSG types, but only one skill gain per participant will be factored into the performance measure. The following are the five types of measurable skill gains, and their corresponding documentation:

- Documented achievement of an increase of an educational functioning level (via preand post-test)
- Documented attainment of a secondary school diploma or equivalent
- A secondary or postsecondary transcript or report card for sufficient credit hours demonstrating satisfactory academic progress
- A satisfactory or better report of progress toward established milestones for training (such as OJT or apprenticeship)
- Passage of an exam required for an occupation or for demonstrating progress in achieving established benchmarks for attaining technical/occupational skills

More information about each of the five methods of establishing Measurable Skill Gains:

Documenting achievement of an increase of educational functioning level – Achievement of at least one educational functioning level (EFL) for a participant enrolled in a secondary education program by comparing a participant's EFL scores on an approved basic skills pre-test to their scores on a basic skills post-test.

- Pre-tests may be provided up to six months prior to program entry.
- The date of post-test must be within the PY and must be before the program exit date.

Documenting attainment of a secondary school diploma – For participants enrolled in a secondary education program, they can also be credited for a skill gain by documenting attainment of a high school diploma or its recognized equivalent during the PY.

A secondary or postsecondary transcript or report card (documenting that the participant is meeting State academic standards) –

Secondary or postsecondary transcript or report card that documents the participant is meeting the state's academic standards outlined by the CDE.

- Enrolled in secondary education: transcript or report card for one semester meeting the state's academic standards.
- Enrolled in postsecondary education: transcript or report card showing a completion of a minimum of 12 hours per semester, or for part-time students a total of at least 12

credit hours over two completed consecutive semesters during the PY, and showing that the participant is meeting the state's academic standards.

A satisfactory or better report of progress toward established milestones for work-based training – A satisfactory or better score/evaluation on a training or progress report from the employer/training provider documenting progress meeting established benchmarks.

- Progress report showing the attainment of an established milestone from an employer or training provider within the reporting period.
- Documentation may vary as subrecipients should identify appropriate methodologies based on the nature of services being provided, but the progress reports must document substantive skill development that the participant has achieved. Examples include:
 - Training reports on milestones completed as the individual masters the required job skills, or steps to complete the training program;
 - o Increase in pay resulting from newly acquired skills;
 - Increase in performance based on newly acquired skills;
 - o Completion of a specific milestone of a registered apprenticeship program.

Passage of an exam required for an occupation or benchmarks for attaining technical/occupational skills – Successful passage of a knowledge-based exam that is required to document progression of trade or training-related benchmarks. A skill gain can be documented via successful passage of:

- an exam in an occupational program;
- an employer-required knowledge-based exam;
- an occupational competency-based assessment; or
- a test necessary to complete a credential.

Documentation of the training/education curriculum showing that an exam is required to complete the program, in conjunction with a certificate of completion, is sufficient evidence that the participant passed an exam. Documentation of the actual exam passed is not necessary in this instance. However, if the participant will not complete the program in the PY, then documentation of the passed exam is necessary.

Measurable Skills Gain Activity Codes

Participation in any of the following OEWD Activity Codes will result in activating inclusion in the calculation of *Measurable Skill Gains*:

A. WIOA Adult/Dislocated Worker Programs

- 300 Occupational Skills Training (approved ETPL provider)
- 301 On-the-Job Training
- 304 Customized Training
- 305 Skill Upgrading and Retraining
- 313 Placed In State or Local Training Non-WIOA or Competitive Grants (if applicable)
- 324 Adult Education with Training Services
- 325 Apprenticeship Training
- 328 Occupational Skills Training Non-ETPL provider or Competitive Grants (if applicable)

B. Youth Program

- 415 Enrolled in Alternative Secondary Education
- 416 Occupation Skills Training (approved ETPL provider)
- 418 Adult Education (GED)
- 421 Enrolled in Post-Secondary Education
- 428 On-the-Job Training
- 429 Enrolled in Secondary School
- 430 Occupational Skills Training (Statewide Youth Provider List)
- 432 Enrolled in Apprenticeship Training

Appendix:

- I. Key Terms & Definitions
- **II.** Industry Recognized Credentials
- **III. Calculation Methodology**
- **IV. Credential Verification Tool**
- V. References
- VI. Inquiries

I. Key Terms & Definitions

Reportable Individual (not enrolled in any OEWD program) – An individual that engages with the workforce development community but does not meet the requirement to be a program participant. A reportable individual is someone who demonstrates an intent to use program services and meets one or more of the following criteria:

- Provides identifying information
- Accesses the self-service system only
- Receives information-only services or activities

Reportable individuals are not included in the calculations for performance. However, certain information about reportable individuals is required to be reported in quarterly and annual WIOA reports. Collecting and reporting information allows the Department of Labor (DOL) to identify individuals that engaged with the system, but did not complete the requirements necessary to become a program participant.

Example – An individual comes to an OEWD Job Center also known as America's Job Center of California (AJCC) to use the computer for a job search and declines any staff-assisted services. However, the individual accepts a Labor Market Information handout. Since this individual engaged in self-service and information-only activities, he/she is a reportable individual.

Participant (enrolled in any OEWD program) – A reportable individual who has received services other than self-service or workforce information-only services or activities, and has satisfied all applicable programmatic requirements to receive program services. To account

for programmatic differences, the definition of participant varies slightly between programs.

Types of Participants are as follows:

Adult, DW, and Competitive Grants (if applicable) Participant – An individual becomes a participant in the program when they do the following:

- Meet the definition of a reportable individual.
- Satisfy all applicable program requirements for the provision of services, including an eligibility determination.
- Receive any training service, individualized career service, and/or basic career service that is not self-service or an information-only service as listed in WSIN 17-09.

Example – An individual who is already registered in Workforce Central (WFC) goes to an AJCC. AJCC staff complete the Title I Adult application and provide a community service referral. The individual then attends a job search workshop and receives an objective assessment from staff. Since this individual provided identifying information, was deemed eligible for the Title I Adult program, and received at least one staff-assisted service, the individual is a participant.

Youth Participant – An individual becomes a participant in the youth program when they do the following:

- Meet the definition of reportable individual.
- Satisfy all applicable program requirements for the provision of services:
 - Eligibility determination
 - o An objective assessment
 - Development of an individual service strategy
- Receive one of the 14 WIOA Youth program elements, as defined in <u>TEGL 10-16</u>, <u>Attachment 7, Table B.</u>

Example – An individual goes to an AJCC and staff determines they are eligible for the Youth program. The individual then receives an objective assessment, study skills training, and develops an individual service strategy. Since this individual has been determined to be program eligible, received an objective assessment and a program element, and developed an individual service strategy, the individual is a participant. If an individual fails to meet one or more of the items needed to be a participant, the individual will be reported as a reportable individual, and will not be included in performance calculations.

Note – <u>All</u> participants who exit the program without an exclusionary exit are included in performance.

Period of Participation – The period of participation begins when an individual becomes a participant in a program, and ends on the participant's date of exit from the program. For all performance indicators, except Measurable Skill Gains (MSG), a new period of participation is counted each time a participant re-enters and exits the program (even if the

Unsubsidized Employment – Employment in the private or public sector where the employer does not receive a subsidy from public funds to offset all or part of the wages and costs of employing the individual.

Secondary School Education – Instruction at or above the 9th grade level that leads to a high school diploma or its recognized equivalent. Postsecondary Education/Training – Instruction from an accredited postsecondary education institution where technical or industry/occupational skills are attained that lead to a recognized postsecondary credential.

Occupational Skills Training – Instruction that includes vocational education and classroom training that is designed to provide technical skills and information required to perform a specific job or group of jobs.

Secondary School Diploma or Recognized Equivalent – California recognized diplomas issued by a California public school, as well as by private schools accredited by the Western Association of Schools and Colleges or equivalent regional accreditation body. The requirements of a secondary school diploma are outlined by the CDE.

A secondary school equivalency certification indicates that a student has completed the requirements for a high school education. California has approved the use of three high school equivalency tests (HSET): GED®, HiSET®, and TASC™. These tests are for students 18 years old and older, and 17 years old in some instances. Those who pass the California High School Proficiency Examination (CHSPE) are awarded a Certificate of Proficiency by the California State Board of Education. While some HSET preparation programs may issue "diplomas or certificates" of completion, these documents are not genuine high school equivalency credentials. There are various HSET preparation programs available for free through the California Adult Education Provider Directory.

Postsecondary Credential – An industry-recognized certificate or certification, a certificate of completion of an apprenticeship, a license recognized by the state or federal government, an Associate or Bachelor's degree, or another industry-recognized credential. A recognized postsecondary credential is based on the attainment of measurable technical or industry/occupational skills necessary to obtain employment or advance within an industry/occupation. These technical or industry/occupational skills are generally based on standards developed or endorsed by employers or industry associations. See Appendix II for more information on the definition of an industry-recognized postsecondary credential.

Labor Market Information – Analyzed data by EDD's Labor Market Information Division (LMID) on the state's labor force, industries, occupations, employment qualifications, employment projections, and wages.

Reporting Period – The timeframe in which performance data is reported. Many of the performance indicators are exit-based, so data cannot be reported until a participant exits the program. For further guidance on what performance indicators are reported during a reporting period, please refer to WIOA Periods for Reporting Outcomes (Attachment 1).

Exit – The date of exit will be used to determine performance for the participant. For instance, if a participant exits between January 1st and March 31st, the first quarter after exit would be April 1st through June 30th.

There are four different types of client exits from services:

1. Date of Exit – Participant

An exit occurs when the participant has not received program services for 90 calendar days, and no additional services are scheduled. The program exit date is applied retroactivity to the last service's actual end date. Follow-up services, self-services, information-only services or activities, and supportive services do not extend the exit date.

2. Date of Exit – Reportable Individual

Reportable individuals are not considered participants in a program, so they do not "exit." However, the date of "exit" for reporting purposes is determined as follows:

- Individual does not become a participant.
- Individual is served by Title I or Title III with only self-service and/or information only services.
- 90 days elapsed since being identified as a reportable individual, and the
 individual has not received additional self-service or information-only
 services or activity during the 90-day time frame. Once the above criteria
 have been met, the date of exit is applied retroactively to the last day of
 receipt of self-service, information-only services or activities, and/or services
 that do not result in the individual becoming a participant. This methodology
 is used to ensure that reportable individuals do not remain in the system
 indefinitely.

3. Common Exit

A common exit occurs when a participant is enrolled in multiple DOL-administered programs, and the following:

 Has not received services for at least 90 calendar days from any DOL administered programs to which the common exit policy applies.
 No future services are planned, with the exception of self-service, information only activities, or follow-up services.

4. Exclusionary Exit

An exclusionary exit occurs when a participant is not included in one or more performance calculations because they exit the program and stop receiving services for one or more of the following reasons:

- Has become incarcerated or becomes a resident at a facility providing 24 hour support, such as a hospital or treatment center.
- Has received medical treatment that is expected to last longer than 90 days.
- Becomes deceased.

- Is a member of a military reserve unit and is called to activity duty for 90 days.
- Is in foster care and exits the program due to moving outside the subrecipient's area*.

*Note – This option only applies to the Youth program. Please reference <u>TEGL 10-16</u>, <u>Attachment 2</u>, <u>Tables A-C</u> for additional information regarding exclusionary exits for each program. Participant Individual Record Layout (PIRL) – The data layout that provides a standardized set of data element, definitions, and reporting instructions that are used to describe the characteristics, activities, and outcomes of WIOA participants. The DOL quarterly and annual report data is calculated using the PIRL file.

II. Industry Recognized Credentials

OEWD defines industry-recognized credentials as those that meet the following requirements:

- 1. Regarding the establishment of credentials: industry insight is intrinsic to the program, completion of which will result in an industry-recognized credential. That is, the program was developed in concert with employers in developing the competencies, curricula, and qualifications for a given credential.
- 2. Regarding the application of credentials: employers, including in the region and beyond, are willing to use these credentials to hire and promote. (See the principles below for more on the importance of portability.)

These principles are drawn from the CWBD Credentialing Framework (see References). The following are examples of entities sanctioned by employers and industry associations that meet these requirements:

- Community Colleges
- Regulatory and Government Agencies (e.g. Federal Aviation Administration, Job Corps, or a State Apprenticeship Agency)
- Professional, Industry, or Employer Organizations

OEWD allows approved professional, industry, or employer organizations to award credentials that can be considered recognized as long as these credentials are based on a valid and reliable assessment of an individual's knowledge, skills, and abilities. Examples of credentials that meet these criteria and can be considered recognized are those such as the National Institute for Automotive Service Excellence certification, National Institute for Metalworking Skills, Inc., Machining Level I credential, and Microsoft Information Technology certificates.

In addition, evidence that employers are requiring a particular credential for employment or advancement in specific occupations or industries as demonstrated by job descriptions and hiring processes that include the credential as a requirement for employment may be

accepted by OEWD as well. For more on determining if a credential is required for employment refer to the "Credential Verification Tool" in Section IV below.

OEWD has identified four targeted industries (Construction, Health Care, Hospitality and Technology*) that are currently in-demand, show continued occupational growth, offer career pathways opportunities, and are validated by local labor market data. For these industries and respective OEWD-funded trainings, OEWD will accept as valid certificates/credentials documentation of completion of particular industry-approved curricula that have been approved by:

- An OEWD recognized industry association, council, etc.; and/or
- An OEWD approved industry employer partner or affiliation of industry partners

*OEWD may identify additional targeted industries in the future that are in-demand, show continued occupational growth, offer career pathways opportunities and are validated by local labor market data. When that occurs, this directive will be updated to include them.

Entities reviewing an industry-recognized credential (including completion of courses of study in targeted industries) should include the following principles for a quality industry-recognized credential. OEWD will evaluate whether the curriculum on which the credential is based, as well as the assessment used to demonstrate mastery of that curriculum (and thus awarding of the credential), submitted for review meets the following characteristics:

- Accessible affordable and readily available at places and times convenient for working adults;
- Transparent clearly articulated costs and prerequisites; accurate picture of what skills, knowledge, and abilities are benchmarked by a given credential, and the value it carries in the labor market;
- Stackable one of multiple manageable chunks that add up to a more substantial credential and do not require starting over at each new step (A sample stackable track in manufacturing is: 16 credit hours leads to a manufacturing production certificate; an additional 10 credit hours leads to an electrical maintenance certificate; an additional 6 hours leads to an industrial electronics certificate; an additional 8 hours leads to a mechatronics certificate; and an additional 20 credit hours stacks up to an Associate in Applied Science Degree Specialization in Mechatronics, at which point a student can transfer to a 4-year college to complete a Bachelor of Science.);
- Portable transferable between firms, regions, and educational institutions;
- Meaningful has value in the labor market; and
- Connected links to a job or an educational pathway.

In general, certificates that count toward the indicator must recognize the skills necessary for a specific industry or occupation rather than general skills related to safety, hygiene, security, etc., even if such general skills certificates are broadly required to qualify for entry-level employment or advancement in employment.

Provider will complete the Sector Training Curriculum Approval Form for every WIOA funded training program that has been approved by industry partners. This form validates that the curriculum has been vetted and does provide participants with industry skills to

enter related career pathway opportunities. Industry partners must sign one Sector Training Curriculum Form for every WIOA funded training. This form needs to be uploaded in WFC and in client filed entry and client files as proof of credential attainment, along with documentation that includes client name, provider name, signature and date. For more on this process, please refer to the, "Industry Recognized Credential Attainment Form Submission Procedure" document.

III. Calculation Methodology

Credential Attainment:

The following provides the method for calculating the primary indicators of performance for Credential Attainment of WIOA Adult, WIOA Dislocated Worker, and WIOA Youth participants.

1. Adult and DW

The number of participants who attained a recognized postsecondary credential during participation or within one year of program exit (numerator) DIVIDED BY the total number of participants who were enrolled in postsecondary education or training during program participation (excluding OJT or customized training) who have exited. For example:

2. Youth

Youth Participants who obtain a secondary school diploma, or its recognized equivalent, must also either be employed, or enrolled in a postsecondary program leading to a recognized postsecondary credential within one year of exit to be included in this performance indicator.

Title I Out-of-school Youth in one of the following are included in this indicator:

- Occupational Skills Training;
- Secondary or postsecondary school attendance school during participation;
- Title II-funded Adult Education at or above the 9th grade level;
- YouthBuild during participation; or
- Job Corps during participation.

The number of Youth participants who obtain a secondary school diploma, or its recognized equivalent, and who are either employed within 4 quarters after program exit or enrolled in a postsecondary program leading to a recognized postsecondary credential within one year (365 days) of program exit DIVIDED BY the total number of participants who enrolled in an education or training program (excluding OJT or customized training) who exited during the reporting period.

attained diploma **and** employed/education w/in time period

Total # exited who enrolled in education or training

The following participants are excluded from this indicator:

- OJT-only participants;
- Customized training-only participants; and
- Exclusionary exit participants (<u>TEGL 10-16 Attachment 2, Tables A C</u>).

Measurable Skills Gain

The following provides the method for calculating the primary indicators of performance for Measurable Skills Gain of WIOA Adult, WIOA Dislocated Worker, and WIOA Youth participants.

This indicator includes the number of participants, who, during a PY, are in an education or training program that leads to a recognized postsecondary credential or employment, and who are achieving documented measurable skill gains (numerator) DIVIDED BY the number of participants, who, during any point in the PY are in an education or training program that leads to a postsecondary credential or employment (denominator). The denominator includes participants receiving ongoing services and/or who have received services during the reporting period and have exited the program. For example:

Note the following:

- A participant is included in the performance indicator, even if enrolled late in the PY.
- Regardless of the number of gains achieved, only one MSG is counted per PY, unless the participant has more than one participation period per PY.
- Work experience or transitional jobs do not place participants in the MSG measure.
- Must attain MSG during the program year on or before exit, otherwise MSG will result in a negative outcome.

IV. Credential Verification Tool

Using LMID's Occupation Data tool at labormarketinfo.edd.ca.gov, an individual can research an industry and identify if a credential is required for employment. If a credential is required for employment, then that credential will often qualify for the credential attainment indicator.

Example steps to confirm valid credential are as follows:

- 1. Identify occupation of interest (ex: Emergency Medical Technician [EMT])
- 2. Using the Occupation Data tool provided on <u>Labor Market Information</u>, research this occupation's profile.
- 3. Determine if this occupation requires a license, identify the title of the license, and the necessary skills to obtain the license.
 - Required license title (e.g., Emergency Medical Technician License)
 - Review skills listed to obtain license (e.g., Managing respiratory, trauma, and cardiac emergencies, and patient assessment. Time in an emergency room or ambulance dealing with bleeding, fractures, airway obstruction, cardiac arrest, and emergency childbirth. Use and maintain common emergency equipment, such as backboards, suction devices, splints, oxygen delivery systems, and stretchers.)

Providers are strongly encouraged to access EDD's Labor Market Information Occupational Guides before determining if a credential and/or occupational certificate qualifies under the Credential Attainment Indicator.

V. References

- WIOA (Public Law 113-128), Section 116
- Title 20 Code of Federal Regulation (CFR) Part 677: "Performance Accountability under Title I of the Workforce Innovation and Opportunity Act"
- DOL Training and Employment Guidance Letter (TEGL) <u>10-16</u>, <u>Change 1</u>, Subject: Performance Accountability Guidance for Workforce Innovation and Opportunity Act (WIOA) Title II, Title III, Title IV Core Programs (August 23, 2017)
- TEGL <u>14-18 (PDF)</u>, Subject: Aligning Performance Accountability Reporting, Definitions, and Policies Across Workforce Employment and Training Programs Administered by the U.S. Department of Labor (DOL) (March 25, 2019)
- TEGL <u>21-16</u>, Subject: Third Workforce Innovation and Opportunity Act (WIOA) Title I Youth Formula Program Guidance (March 2, 2017)
- TEGL <u>26-16</u>, Subject: Guidance on the use of Supplemental Wage Information to implement the Performance Accountability Requirements under the Workforce Innovation and Opportunity Act (June 1, 2017)
- Department of Labor (DOL)-only Performance Accountability, Information, and Reporting System – Office of Management and Budget (OMB) Control No. 1205-0521, <u>Participant</u> <u>Individual Record Layout (PIRL)</u>
- Workforce Services Information Notice <u>WSIN17-09</u>, Subject: CalJOBS Activity Codes (September 29, 2017)
- EDD Directive WSD19-03, *Performance Guidance* (August 28, 2019)
- <u>CWDB Credentialing Framework</u>, Policy Statement by the Increasing Skills & Credential Attainment Workgroup of the California Workforce Development Board (June 14, 2016)
- Labormarketinformation.ca.gov
- California Department of Education
- AAG, CCPT, HUD, CDBG, and Competitive Grants (if applicable) Program Performance requirements

VI. Inquiries

Inquiries should be addressed to OEWD at 415-701-4848 or workforcedevelopment@sfgov.org.

OWED and its service providers shall follow this policy. This policy will remain in effect from the date of issue until such time that a revision is required.