

WIOA NOTICE NO. 19-NOT-01, Change 1

TO: Chief Elected Officials

Local Workforce Innovation Board Chairpersons

Local Workforce Innovation Board Staff WIOA Fiscal Agents and Grant Recipients **WIOA Program Services Administrators**

Illinois workNet® Operators **WIOA State Agency Partners** Other Interested Persons

SUBJECT: Basic Skills Deficiency

DATE: July 9, 2020

I. SUBJECT INDEX

Basic Skills Deficiency Assessment

II. **PURPOSE**

To provide information to all Local Workforce Innovation Boards (LWIBs) on assessments for basic skills deficiency for Workforce Innovation and Opportunity Act (WIOA) programs.

III. **ISSUANCES AFFECTED**

A. References:

Workforce Innovation and Opportunity Act of 2014, Public Law 113-128, as amended

USDOL Training and Employment Guidance Letter (TEGL) No. 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 (August 23, 2017)

USDOL Training and Employment Guidance Letter (TEGL) No. 14-18, 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)

B. Rescissions:

WIOA Notice No. 19-NOT-01, Basic Skills Deficiency (April 2, 2020)

IV. BACKGROUND

Across all titles, the Workforce Innovation and Opportunity Act (WIOA) focuses on serving "individuals with barriers to employment" and seeks to ensure access to quality services for these populations. WIOA Section 134(c)(3)(E) states that recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient must receive priority for individualized career services and training services.

In Illinois, the state aligned WIOA Title I policy with the Title II Illinois Adult Education Assessment policy when determining the basic skills levels of customers for enrollment. This increases the likelihood that customers stay engaged with the WIOA one-stop system. Furthermore, increased collaboration among WIOA partner programs regarding assessment selection decreases the likelihood of customers having to complete multiple assessments to achieve the same purpose and creates greater efficiency in the overall workforce system. The result is optimal performance outcomes for the entire system.

Tests approved to measure basic skills deficiency as defined by WIOA do not measure vocational skills or advanced technical skills. Additional assessments need to occur that are appropriate for those purposes and this notice does not limit their use.

This notice conveys the Illinois Community College Board (ICCB) Adult Education Program approved assessments for use in determining basic skills deficiency as well as the reporting requirements, training for test administrators, and necessary accommodations for assessing customers with disabilities.

V. <u>COMPONENTS</u>

Local Boards are to follow the guidance provided in this notice until formal policy is released.

A. Definition of Basic Skills Deficiency

1. Determining basic skills deficiency during intake assists in qualifying customers for eligibility, demonstrates customer gains, guides referrals, and can determine program effectiveness. For purposes of WIOA:

- a. Basic Skills Deficient (WIOA Section 3(5)) means, an individual
 - 1) Who is a youth, that has English, reading, writing or computing skills at or below the 8th grade level on a generally accepted standardized test; or
 - 2) Who is a youth or adult, that is unable to compute or solve problems, or read, write, or speak English, at a level necessary to function on the job, in the individual's family, or in society.

B. Basic Skills Screening Tool for Priority of Service

- 1. The Basic Skills Screening Tool (Attachment A) will help identify if an individual is basic skills deficient for the purposes of priority of service.
 - a. The tool is for referral purposes and for the identification of priority of service. If the screening tool identifies an individual as basic skills deficient, career planners are to:
 - 1) Refer the individual for adult basic education services; or
 - Conduct further basic skills deficiency assessments using the approved Illinois Adult Education Assessments identified in the Assessment Criteria section of this policy to determine the educational needs of the customer.
 - b. Anyone unable to complete the screening tool without assistance or answers "No" to one or more questions must automatically receive a referral and provided priority of service as having a basic skills deficiency.

C. Assessment Process

- There must be an on-going assessment process for customers rather than just a one-time event. This assessment should use a variety of mechanisms to evaluate and identify the employment goals, appropriate achievement objectives, and the needed combination of services to address barriers.
- 2. During intake there must be an assessment for determining a customer's basic skills. In assessing basic skills, local programs must use assessment instruments that are valid and appropriate for the target population, and must provide reasonable accommodation in the assessment process, if necessary, for individuals with disabilities. As mentioned above, the assessment given to determine reading, math, or language levels is not enough for qualifying placements into vocational or technical skills training and other factors acquired from a full assessment of the customer such as suitability of the training program must occur.

- 3. The Career Planner and the customer must jointly develop the Individual Employment Plan (IEP) or in the instance of Youth an Individual Service Strategy (ISS) and select the services that will best enable the individual to seek and retain self-sufficient employment. Like the assessment, the IEP or the ISS is an on-going process which requires a routine review and update as additional needs are identified or goals achieved. The review should occur at a minimum of once every thirty (30) days.
- 4. Unless the customer was referred to adult basic education services or there is an established process in the Local Workforce Innovation Area (LWIA) Memorandum of Understanding (MOU) for a local Adult Education Provider to conduct an assessment, it is the responsibility of the Title I staff to provide the assessment for determining basic skills deficiency.
- 5. Only tests approved per ICCB Adult Education Assessment Policy are allowable.
 - a. English Speaking Individuals
 - Test for Adult Basic Education (TABE) 11&12 and Comprehensive Adult Student Assessment Systems (CASAS) GOALS are the approved assessments for Fiscal Year (FY) 2021 (Attachment B -Adult Basic Education (ABE)/Adult Secondary Education (ASE) Required Testing).
 - 2) Title I staff administering the TABE 11&12 test must complete the test administration training offered through the ICCB's Illinois Learning, Educational and Academic Resource Network (iLearn) website and receive a certificate.
 - 3) At least one Title I staff person must complete the CASAS implementation training by certified personnel to use the CASAS GOALS assessment.
 - 4) For TABE 11&12, the Locator test must be used to determine the proper pre-test to administer. It may not be solely used as a pre-test or for a post-test.
 - 5) For CASAS GOALS, the Locator test if giving an e-Test or Appraisal if giving a paper test must be used to determine the proper pre-test to administer. It may not be solely used as a pretest or for a post-test.
 - 6) English speaking customers must at a minimum receive the TABE Reading TABE-R (Reading) or CASAS GOALS Reading assessment.
 - 7) If the training program of choice requires math, the customer must also receive the TABE Math TABE-M (Math) or CASAS GOALS Math assessment.
 - b. English Language Learners (English Language Acquisition)
 (Attachment C English Language Acquisition (ELA) Required Testing)

- 1) BEST Literacy™, BEST Plus™ 2.0, or CASAS Life and Work Reading assessments are the approved assessments.
- 2) Title I staff administering the BEST Plus 2.0 test must attend the BEST Plus 2.0 Test Administrator Training Workshop.
- At least one Title I staff person must complete the CASAS training by certified personnel to use the CASAS Life and Work Reading assessment.
 - a) The English Language Acquisition Required Testing attachment outlines the testing requirements from the Assessment Section of the latest Adult Education and Literacy Provider Manual.
- c. All tests must follow the Test Publisher's Guidelines.
- d. Staff administering assessments must rotate test forms as appropriate during customer post-testing.
- 6. Results of the Basic Skills Deficient Assessments must be addressed in the IEP or ISS. This is particularly important if participants are assessed as having basic skill deficiencies and require remediation.
- 7. Customers in the Youth Program may use additional assessments that are valid and appropriate for the population. However, only approved Department of Education National Reporting System assessment instruments are valid for determining measurable skill gain indicator.
- D. Exceptions to Basic Skills Deficient Assessment Testing
 - 1. WIOA Regulation §681.290 provides states with the authority to develop policy on section (b) of the Basic Skills Deficient definition, therefore, with supporting documentation policy will provide exceptions for:
 - a. An individual who has obtained an associate degree or higher;
 - Individuals who within the last year have taken the entrance or placement exam for the postsecondary institution that they intend to attend and passed with scores that do not need developmental or remedial courses in their chosen area of study;
 - c. Youth who within the last six months have taken the entrance or placement exam for the postsecondary institution that they intend to attend and passed with scores that do not need developmental or remedial courses in their chosen area of study;
 - d. Adults or Dislocated Workers who are entering only WIOA On-the-Job Training, Paid Work Experience or Customized Training;
 - e. TAA customers only receiving RTAA; or

f. TAA customers only receiving Job Search and/or Relocation Allowances.

VI. <u>ACTION REQUIRED</u>

Use this information in conjunction with any other guidance received by Office of Employment and Training (OET) until release of the formal policy.

In response to the COVID-19 pandemic, the Illinois Community College Board Adult Education and Literacy Division suspended until further notice, all in-person testing for the TABE and CASAS. Our WIOA Title II partners through the Professional Development Network (PDN) have recently developed online training courses to use remote proctoring of the TABE 11&12 and CASAS tests. The courses can be found on the Illinois Learning, Educational and Academic Resource Network (iLearn) website and are required for any person who will remotely administer the CASAS Life and Work Reading assessment for ESL, the TABE 11&12, and/or CASAS GOALS (Reading or Math) assessments for ABE/ASE in an ICCB-funded adult education program or as part of a Title I partner agency in FY21.

IWDS Entry

The Basic Skills Screening Tool is now incorporated into the Illinois Workforce Development System (IWDS). If using this tool, the only acceptable documentation to support the selection of basic skills deficiency in IWDS is the completed, signed and dated Basic Skills Screening Tool. This form must be kept in the customer's file and noted in the case notes and IEP/ISS (career plan) as applicable.

Any assessment given must be recorded in the Test screens of IWDS. Upon completion of the assessment(s), identified needs must be documented in an Individual Employment Plan (IEP) or in the instance of Youth an Individual Service Strategy (ISS).

The internal logic of IWDS requires a Reading and Math assessment test, therefore, the Career Planner is required to record both a Reading and Math assessment within one year of the start of the training service in IWDS. For a customer whose training doesn't require a Math assessment, there is a new option of "Math Test not Required for the Training Program" in IWDS under the "Other" Category, for the Functional "Math" test choices.

Since the ability to conduct/proctor assessment tests are still limited at this time due to COVID-19, the option for Career Planners to use the 'Can't Complete Test' is being extended. Career Planners may continue to use that option in the Test drop-down on the Add a Test screen for both Reading and Math and enter "Unable to Conduct/Proctor Test Due to COVID-19" in the Comments boxes in IWDS during this timeframe.

When 'Can't Complete Test' is selected, the Grade Level Equivalency (GLE) needs to be recorded as "99" for both Reading and Math.

Note that this will limit the ability for a customer to receive a measurable skill gain via an increase in Educational Functioning Level (EFL) and the measure will need to be obtained in another fashion. See 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 and 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).

VII. INQUIRIES

Inquiries should be directed to OET, Lora Dhom, (217) 558-2429 or lora.dhom@illinois.gov.

VIII. EFFECTIVE DATE

This notice is effective on release.

IX. EXPIRATION DATE

This notice will remain in effect until September 30, 2020.

Sincerely,

Julio Rodriguez, Deputy Director Office of Employment and Training

Attachment(s): A- Basic Skills Screening Tool

B- Adult Basic Education (ABE)/Adult Secondary Education (ASE) Required Testing

C- English Language Acquisition (ELA) Required Testing

D- Summary of Adult Education and Literacy Assessment Requirements

Basic Skills Screening Tool

Name: Click or tap here to enter text.								
Date	of Birth: Click or tap to enter a date.							
1)	Do you have a high school diploma, General Education Development (GED) certificate or High School Equivalency Diploma (HSED)?	_		Yes		No		Currently in high school (does not include GED or HSED programs)
2)	Can you follow basic written instructions and diagrams with no help or just a little help?			Yes		No		
3)	Can you fill out basic medical forms and job applications?			Yes		No		
4)	Can you add, subtract, multiply and divide with whole numbers up to 3 digits?			Yes		No		
5)	Can you do basic tasks on a computer?			Yes		No		
6)	Do you speak and read English well enough to get and keep a job?			Yes		No		
Signature: Date Signed: Click or tap to enter a date. For Internal Use Only:								
Was the individual able to complete the screening tool without help? $\ \square$ Yes $\ \square$ No								
Fo	r the Adult Program Only:		F	or the	You	ith Pro	gram	Only:
If any question is answered, "No" or the form could not be completed independently, the individual should receive priority.			If any question is answered, "No" or the form could not be completed independently, the individual has an eligibility barrier.					
Do	es the individual receive priority?		D	oes t	he in	dividu	al hav	ve an eligibility barrier?
	☐ Yes ☐ No					Yes		□ No
Name of Career Planner: Click or tap here to enter text.								
Career Planner Signature:				C	ate :	Signed	ı: Cli	ick or tap to enter a date.

Adult Basic Education (ABE)/Adult Secondary Education (ASE) Required Testing

The ICCB Adult Education approved tests to measure ABE/ASE or High School Credit (HSCR) customer progress are the TABE 11&12 (Test for Adult Basic Education) and the CASAS GOALS (Greater Opportunities for Adult Learning Success). TABE-R (Reading) or CASAS GOALS Reading and TABE-M (Math) or CASAS GOALS Math are the two assessments that can be used. The allowed TABE assessments come in forms 11 and 12, and the allowed CASAS GOALS forms come in A, B, C, and D.

It is required that programs use the Locator test or Appraisal to ensure that the customer is placed in the appropriate level for pre-testing. The difficulty level of the assessment instrument administered should match the proficiency of the customer to ensure valid scores. The same difficulty level of the assessment instrument must be used to pre- and post-test a customer except when the customer pre-tests near the top of the range, has made extraordinary progress in class, or retakes the Locator and scores at a higher level.

TABE 11&12 Form L is designed for the lowest-level readers and is intended for native English speakers. If a customer lacks the literacy skills to be assessed with the TABE 11&12 Locator, the Word List can be administered first. It is a predictor of customer's ability to complete the Locator. Results of the Word List diagnostic will determine whether to proceed with the Form L or with the Locator. Form L is a proctored test on a consumable form. It cannot be given as a computer-based test.

For training that offer courses that cover a variety of subjects, the program may find it appropriate to assess customers with the TABE-Math (Computation and Applied Mathematics sections) or the CASAS GOALS Math. Programs should consider the primary focus of the training program in determining whether to administer and report a math assessment for placement.

Post-testing to measure progress must be done within the guidelines established by test publishers.

Summary of ABE, ASE and HSCR Testing and National Reporting System for Adult Education (NRS) Levels

NRS Levels	TABE 11&12 Scale Score	Grade Level	
Beginning Literacy	Reading 300-441	0.0 - 1.9	
ABE Level 1	Math 300-448		
Beginning Basic	Reading 442-500	2.0 - 3.9	
ABE Level 2	Math 449-495		
Low Intermediate ABE	Reading 501-535	4.0 - 5.9	
ABE Level 3	Math 496-536		
High Intermediate ABE	Reading 536-575	6.0 - 8.9	
ABE Level 4	Math 537-595	0.0 - 8.9	
Low Advanced ASE	Reading 576-616	9.0 - 10.9	
ABE Level 5	Math 596-656	3.0 - 10.3	
High Advanced ASE	Reading 617+	11.0 - 12.9	
ABE Level 6	Math 657+	11.0 - 12.3	

English Language Acquisition (ELA) Required Testing

All customers must be pre- and post-tested in order to document educational gains. Educational gains are advancement from one functioning level to the next. The three state-approved ELA tests are the BEST Literacy™, BEST Plus™ 2.0, and the CASAS Life and Work Reading.

The BEST (Basic English Skills Test) Literacy is a reading and writing test based on daily tasks such as reading clothing and food labels, addressing an envelope, and filling out a form. This assessment is appropriate for levels 1-5 of ESL (English as a Second Language), has a maximum time for administration of 60 minutes, and is administered individually or to a group. Forms B, C or D are the only approved Best Literacy Assessments in Illinois. If a customer lacks the literacy skills to be assessed with the BEST Literacy (for example, a customer is not literate in his or her native language), then programs may administer the BEST Literacy Screener. If the customer is not successful on the screener, a zero will be recorded in the data collection system as a pre-test score. The screener should only be administered once upon enrollment in the adult education program. Subsequent post-testing should use the BEST Literacy itself, not the screener.

The following approved CASAS Life and Work Reading tests are administered to assess reading in life and work contexts through a multiple-choice format: 27R, 28R, 81R, 82R, 81RX, 82RX, 83R, 84R, 185R, 186R, 187R, and 188R. Level selection for customers should comply with test publisher guidelines. The tests may be administered in a paper-and-pencil format or an electronic format (the eTest). For the paper-and-pencil format, the 25-minute Appraisal identifies the correct pre-test level and form to give initially, while the pre-test score identifies the correct post-test to administer. The eTest moves seamlessly from a computer-adaptive locator into the correct pre-test level and form and identifies the correct post-test to administer. Both the paper and eTest formats take approximately 60 minutes to administer.

The BEST Plus 2.0 is only administered in Illinois as a face-to-face computer adaptive interview. The customer responds to questions asked by the tester based on computer prompts. The items reflect everyday American life at home, at work, and in the community.

In compliance with WIOA and Illinois Policy, ELA customers must be pre-tested using one of the state-approved ELA tests. Customers must be post-tested with a different form of the test to document progress in the ELA course except for BEST Plus 2.0 which is a computer adaptive test that changes with each administration.

Customer scores used for placement and National Reporting System for Adult Education (NRS) purposes must be entered in the data collection system. Answer sheets and scores from any of the tests must be kept in each customer's file.

To ensure reliability and validity of BEST Plus 2.0, test administrators are required to attend the BEST Plus 2.0 Test Administrator Training Workshop. All administrators are required to attend a 6-contact hour training workshop conducted by a certified BEST Plus 2.0 trainer before they may begin testing.

ELA Tests and NRS Levels

Summary of ELA Testing

NRS Levels	BEST Plus**	BEST Literacy*	CASAS**
Beginning Literacy ESL Level 1	361 and Below	0 – 20	180 and Below
Low Beginning ESL Level 2	362 – 427	21 – 52	181-190
High Beginning ESL Level 3	428 – 452	53 – 63	191-200
Low Intermediate ESL Level 4	453 – 484	64 – 67	201-210
High Intermediate ESL Level 5	485 – 524	68 – 75	211-220^
Advanced ESL Level 6	525 – 564	76 – 78	221-235^
Exit Criteria	Above 565	NA	Above 235

The BEST Plus 2.0 is a computer adaptive test. The test changes with each administration and, subsequently, there is no form designation.

Customers should be pre- and post-tested with the same assessment. Exceptions include the following:

- If the customer's pre-test score on the BEST Literacy places them in the Advanced Level and additional ELA services are needed, a second ELA assessment should be given. It is not necessary to post-test on the BEST Literacy as the second assessment will be used for customer placement.
- 2. If the customer's pre-test score on either the CASAS or BEST Plus 2.0 places them in the Exit Criteria range, they should either be administered another ELA assessment that reflects the need for ELA services or be transitioned to ABE, ASE, or post-secondary as appropriate. Post-testing on one of these assessments when the pre-test revealed the Exit Criteria range is not necessary as the second assessment will reflect the customer's level.
- 3. If the customer's pre-test on the BEST Literacy or CASAS reveals ELA Advanced and a second ELA assessment's pre-test reveals the Exit Criteria range, the customer should be transitioned to ABE, ASE, or post-secondary as appropriate.

Adult Education and Literacy Assessment Requirements Summary

Enrollment	Required Test	Optional Test	Notes
Type(s)	•	-	
ELA ¹	One of the following ELA assessments: 1. BEST Literacy™ 2. BEST Plus™ 2.0 3. CASAS Life and Work Reading	If needed, a 2 nd ELA assessment can be administered to the customer. IMPORTANT NOTE: Only one is required for NRS purposes. Programs may elect to administer a second ELA assessment to inform training practices.	If two ELA assessments are administered for placement and NRS purposes, placement for the National Reporting System (NRS) is based on the following: 1. Customer is placed, and progress is measured based on the assessment reflecting the lowest Educational Functioning Level (EFL). 2. If both assessments reflect the same EFL, NRS placement is based on the first assessment given (see exception below). 3. If both assessments reflect the same EFL and both were given on the same day, placement is assigned in the following order (see exception below) ² : a. BEST Plus b. CASAS Life and Work Reading c. BEST Literacy
ABE, ASE or HSCR	One of the following ABE/ASE assessments: TABE 11&12 Reading or CASAS GOALS Reading	TABE 11&12 Math or CASAS GOALS Math IMPORTANT NOTE: Only an ABE/ASE reading assessment is required. If the primary focus of instruction will be math in General Skills designated courses, the TABE-Math or CASAS GOALS Math may be appropriate.	For customers enrolled in ABE, ASE or HSCR courses, the TABE 11&12 Reading or CASAS GOALS Reading is required. However, customers in these types of enrollments can also be given the TABE 11&12 Math or the CASAS GOALS Math either to inform instruction or for placement and NRS purposes.
Math-Only	TABE-Math	None	Customers enrolled in Math-Only instruction should be administered the TABE 11&12 Math or CASAS GOALS Math test. Placement will be based on the EFL reflected by this assessment.

Notes

- See English Language Acquisition (ELA) Required Testing Attachment. Customers enrolled in ELA instruction must be administered at least one of the allowable ELA assessments. If appropriate and needed, a second ELA assessment can also be administered. Both can be given concurrently. If an ELA assessment is used to inform instruction but not placement purposes, the test results must be maintained in the customer file; but only scores used for placement and NRS purposes should be reported in the data collection system. In situations where two ELA assessments are reported for NRS purposes, placement is based on the information outlined above. Prior to post-testing, customers must earn the minimum hours needed for the post-test as outlined per the Test Publisher's Guidelines.
 - * <u>SPECIAL NOTE RE: BEST LITERACY</u> If a customer's pre-test on the BEST Literacy reveals the customer is at the Advanced level, one of the following should occur:
 - The customer should be transitioned to other instruction (i.e., postsecondary, ABE, ASE, etc.) as appropriate. If transitioned to ABE or ASE, appropriate TABE testing should be conducted.
 - If the customer needs additional ELA services, a second ELA assessment reflecting the need for ELA services should be administered.
 - * <u>SPECIAL NOTE RE: BEST PLUS 2.0/CASAS Life and Work Reading</u> If a customer's pre-test on the CASAS reveals the customer is at the Advanced level, one of the following should occur:
 - The customer should be transitioned to other instruction (i.e., postsecondary, ABE, ASE, etc.) as appropriate. If transitioned to ABE or ASE, appropriate TABE testing should be conducted.
 - If the customer needs additional ELA services, a second ELA assessment reflecting the need for ELA services should be administered.
- 2. Exceptions regarding customer placement for ELA include the following:
 - a. For enrollment only in ELA, if the customer's pre-test in the BEST Literacy is at the Advanced Level and another ELA assessment reflects the ELA Exit Criteria range, placement will be based on the BEST Literacy test.
 - If a customer's pre-test on the BEST Literacy reflects the Advanced ELA level and either the CASAS or BEST Plus 2.0 assessment reflects an equal or lower level, placement will occur based on the CASAS Life and Work Reading or BEST Plus 2.0.
 - b. For ELA customers with either a BEST Literacy pre-test at the Advanced level or another ELA pre-test in the Exit Criteria range who are dually enrolled in a class requiring the TABE 11&12 or CASAS GOALS (i.e., ABE, ASE, etc.), the customer's placement and progress for NRS will be based on the EFL of the TABE 11&12 or CASAS GOALS assessment.
 - i. SPECIAL NOTE: In all other instances of dual enrollment between ELA and ABE or ASE, the customer's placement and progress will be based on the ELA assessment.