

OKLAHOMA WORKFORCE DEVELOPMENT ISSUANCE #04-2019

TO: Workforce Development Board Chairs
Workforce Development Board Staff
Workforce Development Fiscal Agents
WIOA Partner Executive Directors

FROM: Sarah Ashmore, Interim Executive Director

DATE: July 9, 2019

SUBJECT: Assessments

PURPOSE: The Oklahoma Office of Workforce Development (OOWD), as the Governor's chosen Workforce Innovation and Opportunity Act (WIOA) administrative entity, provides this guidance on the assessment practices that are to be utilized by the Oklahoma Works one-stop centers in the assessments of WIOA participants.

REFERENCES:

- The Workforce Innovation and Opportunity Act (WIOA)
- U.S. Department of Labor(DOL)/Employment and Training Administration Training and Employment Guidance Letter (TEGL) No. 10-16, Change 1
- TEGL No. 19-16
- TEGL No. 21-16
- Federal Register / Vol. 83, N. 24/Monday, February 5, 2018/Notices; Tests Determined to Be Suitable for Use in the National Reporting System for Adult Education
- National Reporting System for Adult Education: State Assessment Policy Guidelines, Revised August 9, 2018

MESSAGE:

The goal of WIOA is to align services, establish consistency with WIOA partners and to promote program collaboration with in the Oklahoma Works system creating greater efficiency in utilizing existing assessment processes while decreasing duplication of services within the WIOA partner system.

RESCISSIONS
None

EXPIRATION DATE
Continuing



INSTRUCTIONS:

Initial Assessment

An initial assessment is a basic career service made available to all individuals through the American Job Center network. The initial assessment includes a basic assessment of skill levels including literacy, numeracy, and English language proficiency, preferred language, as well as aptitudes, abilities (including skills gaps), and supportive service needs in order to determine the level of services needed by the customer. The use of techniques such as observation, interviews, and evaluations are appropriate initial assessment tools. The selection and use of English Language proficiency assessment tools, and qualified administrators of such tools are to be determined by the local area and must be appropriate to the individual receiving the assessment. The initial assessment should result in a determination of the individual's next steps, next steps may include but are not limited to:

- a comprehensive assessment and the development of an individual employment plan,
- the provision of training or education services
- appropriate referrals based on the initial assessment
- determination of appropriate program enrollment or co-enrollment

Objective Assessment (Title I Youth)

An objective assessment is pre-enrollment activity required to be provided to each title I youth per section 129 (c)(1)(A) of WIOA. The assessment must include a review of the youth's academic levels, skill levels, and service needs of the individual, which includes a review of basic skills, occupational skills, prior work experience, employability, interests, aptitudes, supportive service needs, and developmental needs. The assessment must also consider the youth's strengths, motivations, assets, and unique personality rather than just focusing on areas that need improvement. The purpose of the objective assessment is to identify appropriate services and career pathways that are supported by the assessment and appropriate for the individual youth participant and all information must be incorporated into the youth's individual service strategy (ISS).

For purposes of the basic skills assessment portion of the objective assessment, local programs are not required to use assessments approved for use in the Department of Education's National Reporting System (NRS), nor are they required to determine an individual's grade level equivalent or educational functional level (EFL), although use of these tools is permitted. Local programs must use basic skills assessment instruments that are valid and appropriate for the target population, providing reasonable accommodation in the assessment process, if necessary, for individuals with disabilities. Any formalized testing used must be appropriate, fair, cost effective, well-matched to the test administrator's qualifications, and be easy to administer and interpret results. Skills related gains may be determined through less formal alternative assessment techniques such as observation, interviews, and evaluations. Previous basic skills assessments that have been conducted within the past six months may be used if available. This may include assessments completed by a secondary school, Vocational Rehabilitation, Adult Basic and Literacy Education, or other education or training providers.

Comprehensive Skill & Career Assessment

A comprehensive skill & career assessment is an individualized career service that is provided to an individual after it has been determined that services are required to retain or obtain employment. This assessment will identify the service needs, academic levels, goals, interests, skill levels, abilities, aptitudes, supportive service needs, and measures barriers and strengths of the individual. It includes a review of basic and occupational skills, prior work experience, employability potential, interests, aptitudes, supportive service needs and developmental needs. The purpose of the assessment is to identifying appropriate services and career pathways that are appropriate for the individual and all information must be incorporated into the Adult or Dislocated Workers individual employment plan (IEP).

For purpose of the basic and occupational skill levels determination, diagnostic testing and other assessment tools may be utilized. Assessment instruments that are utilized must be valid and appropriate for the target population, providing reasonable accommodation in the assessment process, if necessary, for individuals with disabilities. Any formalized testing used must be appropriate, fair, cost effective, well-matched to the test administrator's qualifications, and be easy to administer and interpret results. To identify employment barriers and appropriate employment goals the use of in-depth interviewing and evaluations are appropriate assessment tools.

Educational Functioning Level Gain Assessment

When measuring (EFL) gains after program enrollment under the measurable skill gains indicator, WIOA requires standardized assessment for accountability in documenting client educational gains that are aligned with the NRS educational function levels. EFL gains are key indicators of programs' performance and success in preparing WIOA participants for training, postsecondary education opportunities, gainful employment and economic self-sufficiency. EFL measures are defined by the participant's ability to perform literacy-related tasks in the specific skill areas of reading, math and speaking. The NRS educational function level of a student is measured by scale scores on NRS approved standardized assessments.

A process which allows for comparability across programs within the state in order to provide fair and equitable access to services for adult learners, collect consistent data regarding learner placement and advancement, and maintain accurate data for program planning, improvement, and accountability is required. Consistency cross WIOA funded programs in the state is crucial for determining the instructional needs of individual learners, determining the effectiveness of instruction through learner gains, and providing information regarding local program and/or statewide professional development needs.

Effective October 1, 2018, the approved assessments for EFL gains are:

- 1) **Test of Adult Basic Education (TABE)** – Adult Basic Education (ABE) Reading, Language, Mathematics Skills
- 2) **TABE Complete Language Assessment System – English (CLAS-E)** – English Language

Learners (ELL) Reading, Listening, Writing, and Speaking Skills

- 3) **CASAS** – Adult Basic Education Reading and Math; English as a Second Language.
- 4) **Basic English Skills Test (BEST) Literacy 2008** – ELL Reading and Writing Skills
- 5) **BEST Plus 2.0** – ELL Speaking and Listening Skills

To ensure valid results, individuals administering these assessments will follow all assessment administration and scoring guidelines established by the publishers.

- The TABE and CASAS is appropriate for assessing all ABE levels
- TABE CLAS-E, CASAS (Forms 27, 28, 081-088, 513, 514), BEST Plus 2.0, and BEST Literacy are appropriate for assessing ESL levels.
- The TABE Locator and CASAS Appraisal tests should be administered first and used to determine the appropriate Education Level to administer in each subject area. Adult learners unable to complete the TABE Locator Test will be administered the TABE Literacy Level (L) Test. Level L is not approved to measure learning gain.
- Different Forms of the same Level of the TABE and CASAS will be used for the pre- and post-assessments. Example: If a student is pre-assessed using TABE Form 11, Level M, they would then be post-assessed using TABE Form 12, Level M.
- TABE 9/10 should never be mixed with TABE 11/12. Students tested in TABE 9 should be assessed TABE 10. TABE 11 should be paired with TABE 12 only.
- A student's lowest scale score will be used for placement in an EFL and to document learning gains in accordance with NRS guidelines. If this is not the case, written documentation should be placed in the student file explaining why the lowest scale score subject area is not being tracked for learning gain. Subject area scores to be used for measuring learner gain include reading, total math, or language are located in attachment A.

Pre-Assessment: A pre-assessment should assess the learner in the area that are the focus of instruction, using an appropriate standardized test. The appropriate timeframe for a pre-assessment must be determined by local policy. Pre-assessment scores must be documented in OKJobMatch once the assessment is provided and the measurable skills gain is entered into the system. Documentation must be noted in the participants IEP/ISS and documentation must be uploaded in the applicable enrollment upload.

Post-Assessment: If a participant is pre-assessed for the measurable skills gain EFL performance measure the participant must receive the appropriate instructional hours before the participant may be post-assessed according to the following NRS-approved publisher guidelines:

- TABE 9/10 – Entry Levels 1-4:** Minimum 40 hours of instruction (50-60 recommended)
- TABE 9/10 – Entry Levels 5-6:** Minimum 30 hours of instruction (30-59 recommended)
- TABE 11/12 – Entry Levels 1-6:** Minimum 40 hours of instruction (50-60 recommended)
- CASAS – Levels A – D:** Minimum 40 hours of instruction (70-100 recommended)
- TABE – CLAS-E:** Minimum 50 hours of instruction (60-95 recommended)
- BEST Plus 2.0** Minimum 60 hours of instruction (80-100 recommended)

BEST Literacy Minimum 60 hours of instruction (80-100 recommended)

Based on the test publisher recommendations and to avoid a possible “practice effect,” the same TABE Form (11 or 12) should not be administered to a participant more often than every six months or 120 instructional hours.

If a participant exits the program without taking a post-assessment, a new assessment should be administered to determine EFL and no EFL may be obtained without the minimum hours of instruction requirement.

Post-assessment scores can only be documented in OKJobMatch once the required number of instruction hours have been completed and documented. Documentation must be noted in the participants IEP/ISS and documentation must be uploaded in the applicable enrollment upload.

PERFORMANCE ACCOUNTABILITY and REPORTING REQUIREMENTS:

Service Entry:

Services should be entered into the applicable enrollment at the time the service is provided, and no later than seven calendar days after service delivery. The service date must always reflect the actual date of service. Only the actual service delivered to the participant should be entered into the system.

A service must be entered that supports the required instructional hours according to guidance provided and must be supported by uploaded documentation. The service must have the section “leading to a credential” marked “YES” in order for the participant to fall within the denominator of the MSG performance indicator.

Measurable Skills Gains:

The Educational Functioning Level - Measurable skills gain is documented by at least one educational function level gain of a participant who is receiving instruction below the postsecondary level. This gain may be achieved by comparing the participants’ initial EFL, as measured by a pre-assessment, with the participants’s EFL, as measured by a post-assessment.

In order for a participant to fall within the denominator there are three items that are determining factors: 1) they must be either designated in the applicable enrollment demographics as an English Language Learner or Basic Skills Deficient/Low levels of Literacy. 2) School status is determined by the education status, highest grade completed, and highest credential or postsecondary level at program enrollment. 3) A participant must have at least one service entered in the applicable enrollment service and training plan that is designated as a service that leads to a credential.

In order for a participant to fall within the numerator there are three items that are determining factors: 1) there must be a MSG-EFL entered into the MSG section in OKJobMatch and it must be attained within the reporting period 2) pre- and post-assessment scores must be entered into the applicable enrollment testing section of OKJobMatch. 3) Documentation must

be uploaded into OKJobMatch, documenting the assessments, and the required instruction hours based upon guidance.

MONITORING & QUALITY ASSURANCE: The Oklahoma Office of Workforce Development acknowledges that the U.S. Department of Labor and the U.S. Department of Education have the authority to monitor and assess activities to ensure that Federal awards are used for authorized purposes in compliance with Final Rules, federal regulations, and State policies, and that those laws and regulations are enforced properly.

To ensure that policies are being followed, expectations are being met, and compliance with WIOA requirements of 20 CFR 683.400(c)(1), 683.410(b)(2), and 29 CFR 38.51: Local Workforce Development Boards, One-Stop Operators, Fiscal Agents, and Program Service Providers should expect OOWD to conduct Program, Fiscal, Equal Opportunity and Nondiscrimination, and Performance/Data Quality on-site and desktop monitoring.

RECORD RETENTION: In accordance with the Code of Federal Regulations, Oklahoma requires Local Areas and WIOA providers to retain records in the participants file and maintain the file for at least three years following the date on which the final cost report charged to a program year's allotment is submitted, or until all audit and litigation issues are resolved, whichever is later. If any litigation, claim, or audit is started before the expiration of the three-year period, the records then must be retained until all litigation, claims, or audit findings involving the records have been resolved and final action has been taken.

REASONABLE ACCOMMODATIONS: Under Section 188 of the Workforce Innovation and Opportunity Act and related regulations, providers must provide reasonable accommodations to qualified individuals with disabilities, unless providing the accommodation would cause undue hardship. No qualified individual with a disability may be excluded from participation in, or be denied the benefits of a recipient's service, program, or activity or be subjected to discrimination by any recipient because a recipient's facilities are inaccessible or unusable by individuals with disabilities.

EQUAL OPPORTUNITY AND NONDISCRIMINATION STATEMENT: All Recipients, and Sub recipients/Sub grantees must comply with WIOA's Equal Opportunity and Nondiscrimination provisions which prohibit discrimination on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, transgender status, and gender identity), national origin (including limited English proficiency), age, disability, political affiliation or belief, or, for beneficiaries, applicants, and participants only, on the basis of citizenship status or participation in a WIOA Title-I financially assisted program or activity.

ACTION REQUIRED: This Oklahoma Workforce Development Issuance (OWDI) is to become a part of your permanent records and made available to appropriate staff and sub-recipients.

Local Workforce Development Boards should establish policies, interpretations, guidelines and definitions to implement provisions of WIOA to the extent that such policies, interpretations, guidelines and definitions are not inconsistent with the Act, Regulations issued under the Act, Federal Statutes and Regulations governing One-Stop Partner Programs, and OOWD-developed WIOA policies, interpretations, guidelines and definitions.

INQUIRIES: If you have any questions about this issuance, please contact Policy and Program Staff in the Oklahoma Office of Workforce Development. [Contact information can be found at http://www.oklahomaworks.gov/about/](http://www.oklahomaworks.gov/about/).

ATTACHMENTS:

Attachment A: Scale Score Ranges for NRS Educational Functioning Levels

SCALE SCORE RANGES FOR NRS EDUCATIONAL FUNCTIONING LEVELS

TABE 9 and 10 Scale Score Ranges for NRS Educational Functioning Levels

EFL	Reading	Total Math	Language
1 ABE Beginning Literacy	367 and below	313 and below	389 and below
2 ABE Beginning	368 – 460	314 – 441	390 – 490
3 ABE Low Intermediate	461 – 517	442 – 505	491 – 523
4 ABE High Intermediate	518 – 566	506 – 565	524 – 559
5 ABE Low Adult Secondary	567 – 595	566 – 594	560 – 585
6 ABE High Adult Secondary	596 and above	595 and above	586 and above

TABE 11 and 12 Scale Score Ranges for NRS Educational Functioning Levels

National Reporting System Levels	Reading	Total Math	Language
1 ABE Beginning Literacy	300-441	300-448	300-457
2 ABE Beginning	442-500	449-495	458-510
3 ABE Low Intermediate	501-535	496-536	511-546
4 ABE High Intermediate	536-575	537-595	547-583
5 ABE Low Adult Secondary	576-616	596-656	584-630
6 ABE High Adult Secondary	617-800	657-800	631-800

**CASAS Assessment Chart for Educational Functioning Level in Adult Basic Education
(for NRS-approved Reading Goals assessments through February 2025)**

<i>National Reporting System Levels</i>	Reading GOALS Score Ranges
1 Beginning ABE Literacy	203 and below
2 Beginning Basic Education	204-216
3 Low Intermediate Basic Education	217-227
4 High Intermediate Basic Education	228-238
5 Low Adult Secondary Education	239-248
6 High Adult Secondary Education	249 and above

**CASAS Assessment Chart for Educational Functioning Level in Adult Basic Education
(for NRS-approved Math Goals assessments through March 2022)**

<i>National Reporting System Levels</i>	Math GOALS Score Ranges
1 Beginning ABE Literacy	193 and below
2 Beginning Basic Education	194-203
3 Low Intermediate Basic Education	204-214
4 High Intermediate Basic Education	215-225
5 Low Adult Secondary Education	226-235
6 High Adult Secondary Education	236 and above

BEST Plus 2.0 and BEST Literacy Scale Score Ranges for NRS Educational Functioning Levels

<i>National Reporting System Levels</i>	BEST Plus 2.0	BEST Literacy 2008 Effective July 1, 2008
1 ESL Beginning Literacy	88 - 361	0 – 20
2 ESL Low Beginning	362 - 427	21 – 52
3 ESL High Beginning	428 - 452	53 – 63
4 ESL Low Intermediate	453 - 484	64 – 67
5 ESL High Intermediate	485 - 524	68 – 75
6 ESL Advanced	525 - 564	76 – 78*

TABE CLAS-E Scale Score Ranges for NRS Educational Functioning Levels

<i>National Reporting System Levels</i>	Reading	Writing	Total Reading & Writing	Listening	Speaking	Total Listening & Speaking	SPL
1 ESL Beginning Literacy	250-392	200-396	225-394	230-389	231-425	230-407	0-1
2 ESL Low Beginning	393-436	397-445	395-441	390-437	426-460	408-449	2
3 ESL High Beginning	437-476	446-488	442-482	438-468	461-501	450-485	3
4 ESL Low Intermediate	477-508	489-520	483-514	469-514	502-536	486-525	4
5 ESL High Intermediate	509-557	521-555	515-556	515-549	537-567	526-558	5
6 ESL Advanced	558-588	556-612	557-600	550-607	568-594	559-600	6

CASAS Assessment Chart for Educational Functioning Level in English as a Second Language

<i>Educational Functioning Level</i>	CASAS Level	Reading and Listening Score Ranges
1 Beginning ESL Literacy	A	Reading: 180 and below Listening: 162-180
2 Low Beginning ESL	A	Reading: 181-190 Listening: 181-189
3 High Beginning ESL	A	Reading: 191-200 Listening: 190-199
4 Low Intermediate ESL	B	Reading: 201-210 Listening: 200-209
5 High Intermediate ESL	B	Reading: 211-220 Listening: 210-218
6 Advanced ESL	C	Reading: Placement 221-234 Completion 235 and above Listening: Placement 219-226 Completion 227 and above