



SUBJECT: WIA TITLE 1-B YOUTH LITERACY NUMERACY PERFORMANCE MEASURE POLICY

POLICY NUMBER: Y-11-16-12
EFFECTIVE DATE: November 16, 2012

PURPOSE: The purpose of this policy is to provide guidance for the WIA Youth Literacy Numeracy Common Measure performance outcome for the WIA youth service providers in the Tacoma-Pierce County WDC service area.

BACKGROUND

Section 203 (12) of the Adult Education and Family Literacy Act, Title II of WIA, defines “literacy” as “the ability to read, write, and speak in English, compute, and solve problems at levels of proficiency necessary to function on the job, in the family of the individual, and in society.” Without these skills, youth struggle in entering the world of work and are unable to transition from low-skilled jobs to careers that offer family sustaining wages.

The U.S. Department of Labor’s February 17, 2006, Training and Employment Guidance Letter (TEGL) No. 17-05 provided a national directive on the Common Measures for the WIA performance accountability system. There are three common measures that apply to WIA Title I-B programs serving youth: 1) Placement in Employment or Education; 2) Attainment of a Degree or Certificate; and 3) Literacy and Numeracy Gains.

The U.S. Department of Labor’s August 13, 2007, Training and Employment Guidance Letter (TEGL) No. 17-05, Change 1 provided revised Educational Functioning Level (EFL) descriptors for the Youth Literacy/Numeracy performance measure in conjunction with the Department of Education.

The WA State ESD released WIA Policy Number 3685, Revision 1, Literacy and Numeracy on October 23, 2008. The purpose of this policy was to align state Literacy Numeracy policy with DOL ETA TEGL 17-05, Change 1 issued August 13, 2007.

The U.S. Department of Labor’s May 20, 2009, Training and Employment Guidance Letter (TEGL) No. 17-05, Change 2 rescinded TEGL 17-05, Change 1 and provided further clarification to the WIA Youth Literacy Numeracy performance measure in conjunction with the Department of Education. As of the release date of this local policy, WA State ESD has not updated their Literacy Numeracy Policy #3685 Rev. 1 (released October 23, 2008) referencing TEGL 17-05, Change 1.

The U.S. Department of Labor’s March 2, 2012, Training and Employment Guidance Letter (TEGL) No. 18-11 provided guidance to state and local workforce investment area staff and WIA Youth Program service providers to increase Literacy and Numeracy gains of Out-of-school, basic skills deficient youth and to further clarify reporting policies and requirements. This TEGL did not change or replace any previous guidance related to the Literacy Numeracy gains measure.

LITERACY NUMERACY METHODOLOGY (Reference TEGL 17-05):

Of those out-of-school youth who are basic skills deficient:

- # of youth participants who increase one or more educational functioning levels (EFLs) divided by;
- # of participants who have completed a year in the youth program (i.e., one year from the date of first youth program service) plus
- # of participants who exit before completing a year in the youth program.

POLICY

All Out-of-school youth must be assessed for basic skills using the Comprehensive Adult Student Assessment System (CASAS). In-school youth are excluded from this measure.

The results of the CASAS appraisal test determine the Educational Functioning Level (EFL) of an Out-of-school youth, which then determines basic skills level. If the youth is basic skills deficient, then the youth is included in the Literacy/Numeracy measure. *(Note: ETA will no longer issue the EFL descriptors table as a TEGL attachment. Providers are to access the latest National Reporting System (NRS) benchmarks at <http://www.nrsweb.org/pubs/>. Reference TEGL 17-05, Change 2).*

Following the CASAS appraisal test, all out-of-school youth must be assessed (given a CASAS diagnostic pre-test) **within 60 days** following the date of first youth program service unless scores from pre-tests administered up to six months prior to the date of the first youth service are available. The pre-test score sets the baseline for the measure, from which literacy and/or numeracy gains are tracked. No out-of-school youth are exempt from testing based on their education status (e.g., high school graduate, attending post-secondary education). If there is no pre-test, the youth will be included in the **denominator** for the measure for the first participation year and all future years (up to a maximum of three participation years) until a pre-test and successful post-test have been taken or until the youth exits the program.

Individuals who are determined not to be basic skills deficient at pre-test are excluded from this measure.

When administering the CASAS test, individuals with disabilities (as defined in 29 CFR 37.4) should be accommodated according to: Section 188 of WIA; 29 CFR Part 37, Section 504 of the Rehabilitation Act of 1973; Title II of the Americans with Disabilities Act; guidelines associated with the assessment tool used to determine functioning levels; and State law or policies.

The measure includes individuals who are given an initial CASAS diagnostic pre-test but either: do not post-test before exiting the program; or exit before completing a year in the program. If a youth does not take a post-test or takes a post-test after the anniversary date of any participation year, the youth will only be included in the denominator for the literacy/numeracy measure for that participation year. Any test taken after the date of exit is excluded from the literacy/numeracy calculation.

To be included in the **numerator**, a participant must demonstrate through a post-test that he/she has advanced one or more educational functioning levels beyond the level in which he/she was initially placed at pre-test within one year from the date of first youth program service. *[Note: The one year time period is from date of first youth program service, not date of pre-test. For example, the youth has a date of first youth program service of June 1, 2012 and took a pre-test on July 7, 2012; the post-test must be given on or before June 1, 213.]* Literacy/Numeracy outcomes are measured on a yearly basis and are not determined until a full year has elapsed from the youth's date of first service.

Literacy/Numeracy outcomes for a particular participation year are not measured until the anniversary date for that participation year falls within the reporting period. At that point, a determination is made as to whether the youth completed the full year or exited before completing the full year.

Youth are included in the measure for their first participation year whether or not they complete the full participation year. For the second and third participation years, youth are excluded from the measure if they exit before completing the full participation year.

Testing Interval

Service providers are advised to administer appropriate levels of CASAS pre- and post-tests throughout the year to accurately represent student gains and to leave time prior to the calendar year deadline for additional assistance if it appears the youth may fail to make an EFL gain. Service providers should consult with CASAS directly for any questions regarding how to determine appropriate test levels and/or reasonable time frames between pre- and post-testing.

If more than one CASAS diagnostic test is administered after the initial test, the latest test within one year of first youth program service should be used to determine if the participant has demonstrated an increase in at least one educational functioning level. Those youth that show a gain of one (1) EFL within the year "pass" the measure. Those that do not show one (1) EFL gain "fail" the measure.

Individuals who remain basic skills deficient and continue to participate after completing a full year in the program, including pre-test and post-test, must continue to receive basic skills remediation services. These participants must be included in the measure for the first year of participation. They are not included again in the measure until they have completed a second full year in the program. At the completion of the second year, these participants must be included in the measure using the latest post-test score during the second year. To determine an increase of one or more levels, the participant's latest post-test score from the second year in the program must be compared to the score from the test that was administered at the latest point during the first year. If an individual remains basic skills deficient following the second year of the program, that individual must be included in the measure a third time if they complete a third full year in the program. If an out-of-school youth remains in the program for more than three years, the youth will be excluded from the measure after his/her third year in the program.

Documentation

Strategies for addressing youth basic skills deficiencies must be addressed on the Individual Service Strategy and in case notes located in the participant file. Documentation must include dates of pre- and post-tests, skill levels at pre- and post-tests and strategies to improve EFL gains.

Literacy and numeracy gains must be **documented** under the **Job Seeker-Testing section** in **SKIES**. Only **pre- and post-test scores** will be included for federal reporting performance.

YOUTH WITH DISABILITIES

In a client centered system such as under the Workforce Investment Act, the youth and their parents or guardians, not the service providers, properly decide whether a youth is or is not disabled. Likewise, it is up to the youth client and his or her family to disclose or not to disclose the disability to service providers. It is appropriate for service providers to inform clients that reasonable accommodations are available, and then to let the client make an accommodation request. At this point, it may be appropriate to ask for documentation of disability and past accommodations. Although such decisions can be very subjective, workforce professionals are cautioned not to make the decision for the youth or their parents or guardians.

The client can be asked if there are issues in taking a test such as CASAS, and if there are, how best to accommodate such issues. The client may also be asked how such issues have been handled in the past.

Accommodations for assessment tools generally fall into the following categories:

- Changes to the methods of **Presentation** of the test used as the assessment tool, (e.g., providing Braille versions of the test, interpreter, large print, visual clues, repeating directions, or reading aloud).
- Changes to the methods of **Response** to the test questions, (e.g., having the test taker point to a response, mark answers in a book, use reference aids, calculator, tape recorder, word-process, or computer administration).
- Change to the **Setting** in which the test is provided, (e.g., permitting the test to be taken at home, or in small groups, separate room, or special lighting).
- Changes to the **Time/Scheduling** of the test, (e.g., permitting frequent breaks, extending the amount of time generally provided for completion of the test, or giving the test over several days).

Note: It is the policy of the Tacoma-Pierce County WDC that youth whose disabilities may prohibit them from benefiting from training to increase EFL gains, may be excluded from this requirement. Documentation must be in the participant file supporting their exclusion. Providers must understand that even though their participant may be excluded from CASAS pre-testing, the Out-of-school participant will still be included in the performance measure.

DEFINITIONS

Outcomes for the Literacy/Numeracy measure are based on multiple criteria including technical definitions of terminology such as “out-of-school” and “basic skills deficient,” pre-and post-test timing and results, reporting cohorts that are determined by the participant’s first youth service anniversary dates, and various exit considerations. Listed below are some of the main definitions:

Basic skills deficiency - is defined as Out-of-school youth participants who have at least one (1) pre-test score that is less than or equal to EFL 6 (Reference: TEGL 17-05, Change 2).

Educational Gain – At post-test, a participant completes or advances one or more educational functioning levels (EFLs) from the starting level measured on entry into the program (pre-test).

Out-of-school youth - are youth who have dropped out of school, or who have received a secondary school diploma or its equivalent but are basic skills deficient, unemployed, or underemployed [WIA Sec. 101(33)]. For reporting purposes, this term includes all youth except: (i) those who are attending any school and have not received a secondary school diploma or its Recognized equivalent or (ii) those who are attending post-secondary school and are not basic skills deficient (Reference: TEGL 17-05).

Participation Years-

- *First participation year* – From the date of first youth service to the first anniversary date, inclusive.
- *Second participation year* – From the day after the first anniversary date to the second anniversary date. (Youth are only included in the measure if they complete the full year.)
- *Third participation year* – From the day after the second anniversary date to the third anniversary date. (Youth are only included in the measure if they complete the full year.)
- *After third participation year* – Youth are excluded from the measure.

Partner Collaboration -If a pre-test was conducted by a partner (e.g., adult education) using one of the approved assessment instruments within 6 months of the date of participation, grantees may use the scores for pre-test purposes. It should be documented in the case notes that the test occurred within six months of enrollment. *[Note: The same standardized test must be used for both pre and post assessments.]*

Pre-test – A test used to assess a participant’s basic literacy skills which is administered to a participant up to six months prior to the date of first WIA youth service, if such pre-test scores are available, or within 60 days following the date of first youth program service. *[When the pre-test occurs after 60 days following the date of first youth program service, data should still be collected even though the participant has less time to show educational gain at post-test and the pre-test is outside of the recommended boundaries.]*

Post-test – A test administered to a participant at regular intervals during the program. *(To be counted in the numerator, the post-test must be on or before the anniversary date and the date of exit. A post-test is only required for the second and third participation years if the youth completes the participation year.)*

Reporting Cohorts – The cohorts refer to the youth’s anniversary date in the youth program. Whenever an anniversary date falls within the reporting periods, the youth will be included in the measure (assuming no exclusions apply.) The cohorts for the annual report are the same as the fourth quarter cohorts for the literacy/numeracy measures

REFERENCES:

WIA Sec. 136
DOL ETA TEGL 17-05, February 17, 2006
DOL ETA TEGL 17-05, Change 2, May 20, 2009
DOL ETA TEGL 18-11, March 2, 2012
Washington State WIA Policy #3685, Revision 1, October 23, 2008

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