

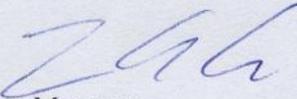


WIA ADMINISTRATION

MEMO: AP 14-06

DATE: 9/24/2015

TO: WIB Directors
WIB Chairpersons
Grant Recipients

FROM: Laurie Colbourn 
Operational Support Manager

SUBJECT: Basic Skills Testing – Sunset, implementation and recording of new tests for the National Reporting System (NRS).

Purpose: This is to advise providers of Basic Skills Testing that as of June 30, 2014 certain Connecticut Competency System (CCS)/CASAS tests have sunset and are no longer acceptable for reporting purposes to the National Report System (NRS). There are other CCS/CASAS pre-post assessment tests that remain on NRS's approved list. This guidance will provide all users of the CTWBS system with modified procedures for reporting test results in the interim of technical changes or the implementation of the new, anticipated CThires system.

Rescissions: This AP will rescind and replace AP 11-06 issued on 4/27/2011

- Background: On Monday August 6, 2012 the federal Department of Education issued 77 FR-46479 which outlined tests that were determined to be suitable for use in the National Reporting System for seven years, three years and expiring tests. Among the list of June 30, 2014, expiring tests were the CCS/CASAS- Employability Competency System (ECS) 130 series tests, and CCS/CASAS Life Skills reading assessments were removed from the list of National Reporting System tests.

Per CCS Assessment Policies and Guidelines issued by the State Department of Education for the State Fiscal Year 2014-2015, the chart on the following page outlines in **bold** which tests now meet the NRS requirements. **NOTE: Life Skills test series may only be used for Math and the Life and Works test series may only be used for Reading. Remember, that the Life Skills appraisal test form 50 and Life and Works Appraisal test for 80 may NOT be used as a pre/post test for determining learning gain.**

CCS Available Tests Chart – Only Test Forms in Bold May be Used for NRS

Test Series	Reading	Math	Listening	Writing
Workforce Learning Systems (WLS)				
Appraisal	230	230		Picture Task: 464/465/466
Level A				
Level B	213/214	213/214		
Level C	215/216	215/216		
Level D				
Life Skills				
Appraisal	50	50		Picture Task: 460/461//462/463
2A	310/311/312/313			
3A	320/321/322/323			
4A	330/331/332/333			
5A	342/343			
Pre-Level A	27/28			
Level A		31/32		
Level B		33/34		
Level C		35/36		
Level D		37/38		
Employability Competency System (ECS)				
Appraisal	130	130		
Level A	11/12	11/12		
Level B	13/14/114	13/14		
Level C	15/16/116	15/16		
Level D	17/18	17/18		
Life and Work				
Appraisal	80		80/ESL	
Level A	81/82/81X/82X		81/82	
Level B	83/84		83/84	
Level C	185/186		85/86	
Level D	187/188			
Citizenship				
Level A	951/952/951X/952X			
Workforce Skills Certification System (WSCS)				
Certification	551	551		
Secondary School Assessment Series				
Level D	513/514	505/506		

POLICY:

I. Measurement of Literacy and Numeracy Gain

Success in the “Literacy and Numeracy” common measure is based upon an increase in the educational functioning level (EFL) of out-of-school youth who are “basic skills deficient”. The methodology for showing an increase is discussed in TEGL 17-05, Change 2

II. “Basic Skills Deficient” Definition

The U.S. Department of Labor defines “basic skills deficient” as follows:

The individual computes or solves problems, reads, writes, or speaks English at or below the eighth grade level or is unable to compute or solve problems, read, write, or speak English at a level necessary to function on the job, in the individual’s family, or in society.

For the purpose of WIA administration in Connecticut, “basic skills deficient” is defined as scoring below 236 in reading and/or math on a Connecticut Competency System (CCS) pre-test assessment.

III. Testing-Tools

Only National Reporting System-approved Connecticut Competency System (CCS) test tools must be used for pre- and post-testing of youth.

The WIBs and/or their designees are to use the CCS/CASAS Life and Work series for pre- and post-testing of Reading and the CCS/CASAS Life Skills series for Math, unless circumstances indicate that another series is more appropriate for an individual.

IV. Appraisal

In the CCS system, an appraisal is administered to determine the appropriate level pre-test for measuring reading and math competencies.

WIBs have four options with regard to the use of appraisals to guide pre-test selection:

1. Administration of the CASAS Life Skills series 50 appraisal form for math and reading;
2. Administration of the Life and Work Skills series 80 appraisal form for reading;
3. Administration of computer adaptive testing locator (i.e. CASAS eTests locator), which automatically assigns the student to the appropriate level pre-test; **or**
4. In lieu of an appraisal, administration of a level D pre-test for reading and a level C pre-test for math.

When computer adaptive testing (e-testing) is utilized, test results are recorded under pre-test scores in CTWBS.

V. Assessment Pre-testing

Assessment pre-testing is required for all out-of-school youth entering the WIA youth program.

A. Criteria for selection of pre-test:

- The selection of the appropriate level pre-test is determined by the result of an appraisal test or CASAS eTests locator.
- If the appraisal is not administered, a level D pre-test for reading and a level C pre-test for math are used.

When computer adaptive testing (e-testing) is utilized, test results are recorded under pre-test scores in CTWBS.

B. The assessment pre-test is:

administered within sixty days of the date of the first WIA youth program service, **and**

- it is given as soon as possible prior to the occurrence of any substantial instructional intervention. “Substantial instructional intervention” is instruction that one would reasonably expect to affect test results

C. An out-of-school youth who scores below 236 on the pre-test in either math or reading is subject to the Literacy/Numeracy common measure.

VI. Assessment Post-Testing

Out-of-school youth who were determined to be basic skills deficient are post-tested until they score 236 or higher in both reading and math, **or** until they exit the program.

- A. The initial post-test version must be in the same series as the pre-test.
- B. The CCS test form number of each subsequent post-test must be different from the form number of the last taken test. The form may or may not be in the same scoring range dependent upon the score of the last taken test.
- C. The initial post-test must be administered within one calendar year, that is 364 days, of the date of the first WIA youth program service.
- D. Second year post-testing and instruction must be administered prior to the second anniversary date of the first WIA youth services.
- E. Subsequent year post-tests and instruction must be administered prior to that year's anniversary date of the first WIA youth service.

VII. Basic Skills Deficiency and Eligibility Determination

A youth who scores below 236 on the pre-test in either math or reading is considered basic skills deficient for eligibility purposes.

Appraisal results (i.e., results from the Life and Work 80 and/or CCS 50 tools) may not be used to determine basic skills deficiency for the purpose of eligibility determination.

The WIBs are to accept CCS test scores from adult education for the purpose of determining WIA eligibility provided that:

- There has not been substantial instructional intervention; and
- Test results are no more than 90 days old.

The WIBs, at their discretion, may accept CCS test scores from organizations and agencies other than adult education for the purpose of determining WIA eligibility provided that:

- There has not been substantial instructional intervention; and
- Test results are no more than 90 days old.

VIII. In-School Youth

Although in-school youth are not included in the Literacy and Numeracy Gain measure, it is the expectation of the U.S. Department of Labor that the educational functioning level of all youth be *reviewed* under WIA.

The methods of review include but are not limited to:

- Review of school records,
- Information gathered from the in-school youth participant and/or family member; and
- Assessment pre-testing using CCS and/or other tools which measure educational skill levels.

WIBs are not required to *administer* appraisal and pre-test assessment to in-school youth. However, WIBs may do so at their own discretion.

IX. Accepting Test Results from Outside Entities

The WIBs are to accept NRS approved CCS test scores from adult education for the purposes of determining pre-test selection and/or as a pre-test score provided that:

- there has not been substantial instructional intervention; **and**
- test results are no more than 90 days old.

The WIBs, *at their discretion*, may accept NRS-approved CCS test scores from organizations and agencies other than adult education, provided that these conditions regarding substantial instructional intervention and age of test results are met.

CCS test scores from any series (that is, Life Skills, Workforce Learning Systems - WLS, Life and Work - LW, Citizenship) may be accepted.

Release authorizations, signed by the student, or legal guardian if appropriate, must accompany test results coming from adult education or any other organization.

X. Testing Youth with Special Needs and/or Disabilities

WIBs are responsible for providing reasonable accommodations when testing youth with documented disabilities.

Accommodations in testing alter the *conditions for administering* a test or change the nature of an instrument allowing test-takers with disabilities to demonstrate more accurately their skills and abilities. Proper accommodations meet the needs of examinees *without changing what a test is intended to measure*.

Accommodations may be similar to “test-taking strategies” such as:

- requesting to take only one test per day,
- testing in an alternate quiet room or
- taking frequent breaks.

Test-takers may also use a variety of aides when taking a test, such as using:

- a plain straight-edge ruler,
- a different type of answer sheet,
- magnifying strips,
- colored overlays,
- ear plugs, or
- other devices as deemed appropriate.

It is not an appropriate accommodation to read a reading test to a test-taker with low literacy skills or blindness. The purpose of a reading test is to assess reading skill levels and to determine the test-taker's appropriate instructional level, not to assess knowledge of a subject area. [See CCS Assessment Policies and Guidelines.]

<http://www.sde.ct.gov/sde/lib/sde/pdf/deps/adult/accountability/ccspolicies.pdf>

When administering appraisal and assessment tools, individuals with disabilities are to be provided with reasonable accommodations, as appropriate, according to:

1. Section 188 of the Workforce Investment Act (implementing regulation at 29 CFR Part 37), Section 504 of the Rehabilitation Act of 1973 (DOL implementing regulations at 29 CFR Part 32), and Title II of the Americans with Disabilities Act, if applicable, (implementing regulations at 28 CFR 35);
2. Guidelines associated with the appraisal and assessment tools; **and**
3. State laws and/or policy.

Regulations implementing WIA Section 188, found at 29 CFR Part 37, provide a general definition of “reasonable accommodation” for individuals with disabilities. In essence, such accommodations are modifications or adjustments, made on a case-by-case basis, “that enable a qualified individual with a disability . . . to receive aid, benefits, services, or training equal to that provided to qualified individuals without disabilities.” (See 29 CFR Part 37.4, definition of “reasonable accommodation.”)

In the appraisal and assessment context, “accommodations” are changes that are made to the materials or procedures used for the assessment to ensure that the assessment tool measures the individual's skills and abilities, and not his or her disabilities. Because youth with disabilities are expected to achieve the same gains as other youth, it is critically important that appropriate accommodations be provided for the assessment process, to ensure that the gains achieved by these youth can be determined accurately.

Accommodations for the assessment process generally fall into the following categories:

- Changes to the methods of presentation of the tool used as appraisal or assessment tool: e.g., providing Braille versions of the test, or orally reading the directions or test questions to test-takers:
- Changes to the methods or response to the test questions: e.g., having the test-taker point to a response or use a computer for responding:

- Changes to the setting in which the test is provided: e.g., permitting the test to be taken at home, or in small groups, rather than in a large-group or institutional setting; and/or
- Changes to the timing/scheduling of the test: e.g., extending the amount of time generally provided for completion of the test, permitting frequent breaks.

The Employment and Training Administration (ETA) of the U.S. Department of Labor fully expects that most youth with disabilities can, and should, be assessed using tests that specifically crosswalk to educational functioning levels, using accommodations where needed. ETA also recognizes that in very limited instances, use of these testing instruments, even with appropriate accommodations, may not provide a valid or reliable evaluation of the literacy and numeracy skills of a youth with one or more disabilities. These instances may arise because of the nature or extent of a particular individual's disability, and/or because of limitations in the testing instruments themselves.

Testing accommodations must be consistent with the disability documentation. Test-takers are responsible for providing documentation of the disability. Decisions regarding accommodations are made on a case-by-case basis.

XI Performance Adjustment

The U.S. Department of Labor and the Connecticut Department of Labor acknowledge that the nature of some disabilities, such as severe cognitive impairment, may preclude meaningful literacy and numeracy testing and consequent attainment of the literary and numeracy common measure goal. It is not the intent of the federal and state Departments of Labor to discourage WIA participation by individuals who have such disabilities.

In order to foster WIA program development for individuals who have such disabilities, WIBs may request one of two adjustment methods:

1. Service to individuals with such circumstances can be addressed in annual WIA performance negotiations. In effect, negotiated target performance would be adjusted from expected levels so that a WIB would not be penalized for serving individuals who may not reasonably be expected to attain a positive outcome in a performance measure, specifically the measures for attainment of a degree or certificate or an increase in literacy and numeracy.
2. WIBs can request a performance adjustment at the end of the program year being measured. As part of such a request, WIBs must demonstrate that the inclusion of individuals with such circumstances negatively impacted performance.

XII. Test Administration

WIBs must designate a WIB CCS Program Facilitator who is trained by the State Department of Education in CCS test administration. The Facilitator will be responsible for testing and/or for training test facilitators. The Facilitator must complete CCS Training Part 1 (Appraisals) and Part 2 (Survey Achievement Pre and Post Assessments).

WIBs must maintain a current *Test Security Agreement* that outlines the requirements relative to the secure storage and handling of all CCS materials. A signed *Test Security Agreement* must be filed with Adult Training and Development Network (ATDN) division of CREC or other entity designated by the Connecticut State Department of Education.

Resources:

- “Connecticut Competency System (CCS), Assessment Policies and Guidelines, Fiscal Year – 2014-15,” Connecticut State Department of Education, Bureau of Early Childhood, Career and Adult Education.

<http://www.sde.ct.gov/sde/lib/sde/pdf/deps/adult/accountability/ccspolicies.pdf>

- “Training and Employment Guidance Letter No. 17-05, Subject: Common Measures Policy for the Employment and Training Administration’s (ETA) Performance Accountability System and Related Performance Issues,” U.S. Department of Labor, Employment and Training Administration, February 17, 2006.

<http://wdr.doleta.gov/directives/attach/TEGL17-05c2acc.pdf>

- CFR- Title 34, Subtitle B, Chapter IV, Part 462

<http://www.gpo.gov/>

- Federal Register Volume 77, Issue 151 (August 6, 2012)- 77 FR 46749 - TESTS DETERMINED TO BE SUITABLE FOR USE IN THE NATIONAL REPORTING SYSTEM FOR ADULT EDUCATION

<http://www.gpo.gov/fdsys/granule/FR-2012-08-06/2012-19143>

Attachments:

Entering new NRS tests in CTWBS