TO: Workforce Development System Partners

FROM: Gary Kamimura, Policy Manager

SUBJECT: Temporary suspension of WorkSource System Policy 1101 (CASAS for Basic Skills Assessment) to allow alternative documentation of basic skills deficiency in WIOA Title I-B programs

Purpose:

To communicate the temporary suspension of WorkSource System Policy 1101, Revision 6, which requires Local Workforce Development Boards (LWDBs) to use CASAS to document basic skill deficiency in WIOA Title I-B programs, and to identify other documentation options allowed in federal WIOA Title I-B programs guidance (see Attachment A).

Action Required:

Local Workforce Development Boards and their contractors, as well as Employment Security Regional Directors, must distribute this guidance broadly throughout the system to ensure that WorkSource System staff are familiar with its content and requirements.

Content:

Across all titles, 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 priority for individualized career services and training services must be given to recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient (BSD).

Basic Skills Deficient (WIOA Section 3(5)) means, with respect to an individual - (a) who is a youth, that the individual has English reading, writing, or computing skills at or below the 8th grade level on a generally accepted standardized test; or (b) who is a youth or adult, that the individual 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.

WorkSource System Policy 1011 Revision 6 requires the use of CASAS tests as the only option to determine BSD in WIOA-affiliated programs, including the Title I Youth and Adult programs. WorkSource offices across the state are closed to in-person traffic, making it impossible for WIOA Title I staff to administer paper CASAS tests.

All youth program participants must have an assessment of basic skills as a part of the objective assessment; however, this type of assessment is less formal than the assessment to determine BSD (TEGL 21-16). There is no requirement to test all Youth and Adult applicants for basic skills deficiency, only those for whom BSD is being established as an eligibility criterion.

The WorkSource System is an equal opportunity employer/program. Auxiliary aids and services are available upon request to individuals with disabilities. Language assistance services for limited English proficient individuals are available free of charge.
Due to the current COVID-19 pandemic, the State is committed to exercising as much flexibility as possible to local workforce development boards (LWDBs) and their service providers to establish BSD as an eligibility or priority of service criterion in WIOA Title I Youth and Adult programs.

This guidance is in effect no longer than 6 months (10/17/2020), or until the WTECB determines by an earlier date that one-stop centers are reopened, CASAS is broadly available at the state’s community and technical colleges, or CASAS is widely available in an acceptable, fully remote/virtual format. If any of those conditional determinations are made before 10/17/20, notice of the WTECB’s determination and rescinding of WIN 0107 will be broadcast through GovDelivery and other appropriate communication channels.

References:

- WorkSource System Policy 1011 Revision 6
- WIOA Section 3(5)
- Training and Employment Guidance Letter (TEGL) 21-16

Website:

https://wpc.wa.gov/policy/state/guidance

Direct Inquiries To:

Employment System Administration and Policy
Policy, Data, Performance and Integrity Division
Employment Security Department
SystemPolicy@esd.wa.gov

Attachments:

Attachment A – Alternative means of establishing basic skills deficiency (BSD)
Attachment A

The following alternative means of establishing BSD in the WIOA Title I Youth and Adult programs are as follows:

<table>
<thead>
<tr>
<th>Youth Program</th>
<th>Federally allowable options to determine and document BSD:</th>
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<tbody>
<tr>
<td>Basic skills deficient – In school youth (ISY) per WIOA Section 129(a)(1)(C)(iv)(I)</td>
<td>• CASAS assessment (paper or e-test)</td>
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<tr>
<td>or Out of school youth (OSY) per WIOA Section 129(a)(1)(B)(iii)(II)(aa)</td>
<td>• Transcript with a failing grade in math or reading during the most recent academic year (or a detailed case note if verified verbally with appropriate entity)</td>
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<td></td>
<td>• School records showing test scores from a generally accepted standardized test within the last year showing grade level below 9th grade (grade 8.9 or lower) (or a detailed case note if verified verbally with appropriate entity)</td>
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<thead>
<tr>
<th>Adult Program: Priority of service categories 1 &amp; 2</th>
<th>Options to determine and document BSD:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Basic skills deficient per WIOA Section 134(c)(3)(E)</td>
<td>• CASAS assessment (paper or e-test)</td>
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<td></td>
<td>• Verification of enrollment in a Title II adult education program (documented in case notes)</td>
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<td></td>
<td>• Staff observation of deficient functioning, such as observing the applicant is not able to read or complete an application form, or observing that applicant does not have basic computer literacy (documented in case notes)</td>
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<td></td>
<td>• Self-certification that the individual lacks a HS diploma or equivalency</td>
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