

## TEXAS WORKFORCE COMMISSION LETTER

**ID/No:** WD 61-06, Change 1

**Date:** March 1, 2007

**Keywords:** TANF Choices;  
TWIST; WIA

**To:** Local Workforce Development Board Executive Directors  
Commission Executive Staff  
Integrated Service Area Managers



**From:** Laurence M. Jones, Director, Workforce Development Division

**Subject:** Literacy and Numeracy Testing for Out-of-School Youth: Update

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### **PURPOSE:**

To provide Local Workforce Development Boards (Boards) with **updated** information on implementing the Literacy and Numeracy Gains Common Measure for Workforce Investment Act (WIA) Out-of-School Youth, specifically:

- assessment procedures for the Test of Adult Basic Education (TABE);
- data entry procedures in The Workforce Information System of Texas (TWIST) for out-of-school youth who are basic-skills deficient; and
- reasonable accommodations when testing youth with disabilities.

### **REFERENCE:**

Workforce Investment Act

Implementation of the Nondiscrimination and Equal Opportunity Provisions of the Workforce Investment Act of 1998, 29 C.F.R. Part 37

United States Department of Labor Training and Employment Guidance Letter No. 17-05, issued February 17, 2006, and entitled "Common Measures Policy for the Employment and Training Administration's (ETA) Performance Accountability System and Related Performance Issues"

[http://wdr.doleta.gov/directives/corr\\_doc.cfm?DOCN=2195](http://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=2195)

United States Department of Labor Employment and Training Administration's Program Guidance, "Frequently Asked Questions on Common Performance Measures"

<http://www.doleta.gov/Performance/guidance/Q&A.cfm>

Common Measures and Integrated Performance Waiver

<http://www.twc.state.tx.us/boards/wia/prowaiverintegratedreporting.pdf>

WD Letter 08-05, issued January 13, 2005, and entitled "Test of Adult Basic Education Forms 9&10"

WD Letter 65-05, issued September 14, 2005, and entitled "Common Measures"

WD Letter 42-06, Change 1, issued October 10, 2006, and entitled “Workforce Investment Act: Interim Procedures for Testing Literacy and Numeracy Gains for Out-of-School Youth – Update”

### **FLEXIBILITY RATINGS:**

**No Local Flexibility (NLF)**: This rating indicates that Boards must comply with the federal and state laws, rules, policies, and required procedures set forth in this WD Letter and have no local flexibility in determining whether and/or how to comply. Federal and state laws, rules, policies, and required procedures with a “No Local Flexibility” rating are indicated by the acronym, **NLF**, in the margin to the right of the applicable paragraph. Additionally, all information with a “No Local Flexibility” rating is indicated by “must” or “shall.”

Failure to comply with the federal and state laws, rules, policies, and required procedures with a “No Local Flexibility” rating may result in corrective action, up to and including sanction and penalty.

**Local Flexibility (LF)**: This rating indicates that Boards have local flexibility in determining whether and/or how to implement guidance or recommended practices set forth in this WD Letter. All guidance or recommended practices with a “Local Flexibility” rating are indicated by the acronym, **LF**, located in the margin to the right of the applicable paragraph. Additionally, guidance or recommended practices with a “Local Flexibility” rating are indicated by “may” or “recommend.”

Boards are not subject to corrective action for failure to comply with guidance or recommended practices with a “Local Flexibility” rating.

### **CHANGES TO WD LETTER 61-06:**

New information in this WD Letter is indicated by:

- A ~~strike through~~ of the original language, which indicates that language has been deleted; and
- **Bold** typeface, which indicates new or clarifying language.

### **BACKGROUND:**

U.S. Department of Labor (DOL) Training and Employment Guidance Letter (TEGL) No. 17-05 ([http://wdr.doleta.gov/directives/corr\\_doc.cfm?DOCN=2195](http://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=2195)) addresses Common Measures performance issues and reporting requirements. TEGL 17-05 outlines DOL’s strategic vision for serving WIA out-of-school youth who are basic-skills deficient. Performance is to be assessed by literacy and numeracy gains.

TEGL 17-05 provides that all WIA out-of-school youth whose first WIA Youth service was on or after July 1, 2005, will be included in the Literacy and Numeracy Gains Common Measure beginning with Program Year 2006.

A poll indicated that most Boards use TABE to determine a youth’s basic skill level. As a result, programming efforts have focused on entering TABE results into TWIST. As required, additional guidance will be issued regarding other assessment tools and TWIST data entry procedures.

This WD Letter provides information on the following:

- Deadline for entering pre- and post-test scores into TWIST

- TABE assessment tool
- Administering TABE
- Entering TABE scores into TWIST
- Testing WIA out-of-school youth with disabilities

**This WD Letter supersedes and rescinds WD Letter 61-06 and its two attachments, issued December 4, 2006, and entitled “Literacy and Numeracy Testing for Out-of-School Youth.”**

**PROCEDURES:**

*Effective immediately*, Boards must enter *all* scale scores into TWIST no later than:

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- **20 calendar days from the administered pre-test; and**
- **20 calendar days after the end of the calendar quarter in which the last post-test was administered.**

~~*Effective immediately*, Boards must enter into TWIST all existing pre and post-test scores for out-of-school youth identified in the Pre and Post-Test TWIST Web Reports, by January 17, 2007, for all first WIA Out-of-School Youth services provided between July 1 and December 31, 2005.~~

Boards must ensure that *all* WIA out-of-school youth who were pre-tested prior to the issuance of this WD Letter are post-tested timely with the original assessment tool. Accordingly, all future pre- and post-tests must be administered with the same assessment tool to accurately measure achievement under the Literacy and Numeracy Gains Common Measure.

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**Boards must ensure that:**

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- **accurate records are maintained for data validation purposes, including files, worksheets, reports, and source documentation, as required; and**
- **validated files and original supporting documentation for monitoring purposes are retained.**

Test of Adult Basic Education Assessment Tool

For purposes of the Literacy and Numeracy Gains Common Measure, TABE is currently the only testing tool programmed in TWIST to collect data on all WIA out-of-school youth who are basic-skills deficient.

Boards must enter **scale test** scores for other DOL-approved assessment tools on the *Testing* tab in TWIST under their respective categories and functional areas. Additionally, Boards must be aware that these scores will not count toward performance until automation modifications are in place.

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When entering scores into TWIST for WIA Adult, WIA Dislocated Workers, and Choices **eligibles individuals**, Boards also must enter scale scores for TABE and other DOL-approved assessments.

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Administering the Test of Adult Basic Education

Boards must ensure that the TABE assessment procedures set forth in *Administering the Test of Adult Basic Education* (Attachment 1) are followed.

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Entering Test of Adult Basic Education Scores into TWIST

Boards must ensure that the instructions for entering assessment scores in TWIST—as they relate to the Literacy and Numeracy Gains Common Measure—set forth in *Procedures for Entering Test of Adult Basic Education Scores in TWIST* (Attachment 2) are followed.

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Boards must ensure that the scale scores—listed in TABE Forms 7&8 and TABE Forms 9&10 for the *Survey* and *Complete Battery*—for reading, total math, and language are entered into TWIST.

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Testing WIA Out-of-School Youth with Disabilities

When administering assessment tools, Boards must ensure that out-of-school youth with disabilities are provided with reasonable accommodations, as appropriate, as set forth in:

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- WIA §188 (29 C.F.R. Part 37);
- Section 504 of the Rehabilitation Act of 1973 (29 C.F.R. Part 32);
- Title II of the Americans with Disabilities Act, if applicable (28 C.F.R. Part 35);
- guidelines associated with the assessment tools; and
- local policies.

For further information, see “Testing Youth with Disabilities” in TEGL 17-05.

**ACTIONS REQUIRED:**

Boards must ensure that appropriate staff is apprised of and complies with the requirements in this WD Letter.

**INQUIRIES:**

Direct inquiries regarding this WD Letter to the assigned contract manager for your local workforce development area.

**ATTACHMENTS:**

Attachment 1: Administering the Test of Adult Basic Education

Attachment 2: Procedures for Entering Test of Adult Basic Education Scores in TWIST

Rescissions: WD 61-06	Expiration: Continuing
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