PY 2023 LOWCOUNTRY WORKFORCE INSTRUCTION NUMBER 19

TO: Lowcountry Workforce Innovation and Opportunity Act (WIOA) Contractors/Service Providers/Sub-recipients/One-Stops

FROM: MICHAEL V. BUTLER
Lowcountry Workforce Development Director

SUBJECT: Guidance on Assessment Services provided through the Youth, Adult and Dislocated Worker Programs and Definition of Basic Skills Deficient under the Workforce Innovation and Opportunity Act (WIOA)

ISSUANCE DATE: November 9, 2023

EFFECTIVE DATE: July 1, 2023

REVISED EFFECTIVE DATE: N/A

EXPIRATION DATE: Indefinite

PURPOSE:
The purpose of this policy is to communicate local policy regarding activities that constitute Assessment for Workforce Innovation and Opportunity Act (WIOA) Title I Adult, Dislocated Worker and Youth program participants for the Lowcountry:

- to rescind PY 2015 LOWCOUNTRY WORKFORCE INSTRUCTION NUMBER 01 Definition of Basic Skills Deficient
- to rescind PY 2020 LOWCOUNTRY WORKFORCE INSTRUCTION NUMBER 11 Assessment Service
- to define Basic Skills Deficient for the Lowcountry

Background:
Workforce Innovation and Opportunity Act (Public Law 113-128)

- Section 3(5) BASIC SKILLS DEFICIENT.—The term "basic skills deficient" 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.
• Section 134(c)(3)(E) PRIORITY.—With respect to funds allocated to a local area for adult employment and training activities under paragraph (2)(A) or (3) of WIOA section 133(b), priority shall be given to recipients of public assistance, other low income individuals, and individuals who are basic skills deficient for receipt of career services described in paragraph WIOA Section 134(c)(2)(A)(xii) and training services. The appropriate local board and the Governor shall direct the one-stop operators in the local area with regard to making determinations related to such priority.

POLICY:
All Assessment must be conducted in accordance with the Ethics and Standards published by the National Association of Social Workers. (2013). NASW Standards for Social Work Case Management. https://www.socialworkers.org/LinkClick.aspx?fileticket=acrzqmEfhlo%3D&portalid=0.

All Assessment will be conducted in compliance with the WIOA Act and WIOA Regulations and any applicable Federal, State or local guidance.

A new assessment of a participant is not required if the Title I service provider determines it is appropriate to use a recent assessment of the customer conducted pursuant to another education or training program (documentation of the assessment must be maintained in SCWOS).

Reasonable accommodations must be provided upon request.

Standardized (formal) assessment tests may be used as deemed appropriate by the assigned case management staff.

Interview assessment will be utilized when standardized assessment is not available or inappropriate.

Assessment is a continuous process throughout program participation. The purpose of assessment is to identify appropriate services and career pathways for participants and must be used to develop the Plan.

All Assessment results will be used in the development and revision of the individual's Plan in SCWOS. All results will be reviewed periodically and revised as needed; all will be documented in SCWOS through case notes, updates to the Plan, Assessment, and/or Self-Assessment tabs, and Services data entry in SCWOS as applicable.

All initial Assessment results and interpretation will be included in the Enrollment Case note and communicated to the participant as detailed below.

Additional Assessment or Reassessment results and interpretation will be recorded in a case note and communicated to the participant as detailed below.

All Assessments administered will be explained to the individual prior to administration.

All Assessment results will be provided to the individual and will include an explanation and an interpretation of the results in a manner understandable to the individual and will include how the
results are used in the development and revision of the Individual Service Strategy/Individual Employment Plan.

Title I WIOA funds, which includes the cost of staff, must not be used prior to both a determination of eligibility and participation for Adults and Dislocated Workers.

ASSESSMENT

1. **Program Enrollment Determination:**
   Required for those who are determined eligible for multiple Title I WIOA programs:
   A determination must be made regarding program enrollment. Determination of the appropriate program for the participant will be based on the service needs of the individual and if the individual is career-ready based on an assessment of their occupational skills, prior work experience, employability, and the individual’s needs.
   - This required determination and justification of program enrollment based on the above criteria will be documented in the Enrollment Case Note in SCWOS.

2. **Comprehensive Objective Assessment Summary (OAS)**
   Required for all Participants. Each participant must be provided a comprehensive objective assessment to identify skills, competencies, and supportive service needs.

   At enrollment (one time per enrollment), the required Comprehensive Objectives Assessment will be documented in SCWOS through the use of the SCWOS Objective Assessment Summary (OAS). The Assessment must include a review of basic skills, occupational skills, prior work experience, employability, interests, aptitudes (including interests and aptitudes for nontraditional jobs), supportive service needs, and developmental needs of such participant, for the purpose of identifying appropriate services and career pathways for participants.
   The SCWOS Objective Assessment Summary is never printed or scanned or signed, it must be reviewed with the participant including a discussion of how the information will be used regarding the development of the Plan (Individual Employment Plan-IEP or Individual Service Strategy-ISS).

3. **Educational Background:**
   Required for all Participants. Must include information regarding educational achievement. This includes highest grade completed, and if applicable post-secondary major or vocational area of study and attainments including credentials.

4. **Basic Skills Status:**
   a. Required for all Youth Eligibility Determinations.
   b. Preferred, but not required for Adult and Dislocated Worker Eligibility determinations.
      - 75% Adult Priority must be met
   c. Training and Education Services for Youth, Adults and Dislocated Workers:
      determination of Basic Skills Status and if needed remediation and attainment of the required Basic Skills Level Scores is required per the admission requirements of the applicable Training or Education Provider for the course of study.
      - See definition of Basic Skills Deficient below for more detailed information and requirements.
5. **Prior Work Experience:**
Required for all Participants. Must include information regarding prior Work Experience of at least 2 most recent jobs or more if needed to cover the past 2 years. If no Work History exists or if Work History is less than two years this must be clearly stated in the Enrollment Case Note. In addition to the case note Work History must be entered (or edited as needed for accuracy) in SCWOS Employment History at Eligibility Determination (application). Staff must complete and edit data entry as needed to ensure accurate Job Titles and Codes, Job Description, Wage, Employment Dates, and if applicable, Reason for Leaving as this data informs assessment of occupational skill and employability.
- If need for additional assessment is identified through case management: My Skills My Future (Transferable Skills).
- After application and participation, Work History must be updated with current Employment data as it changes.

6. **Occupational Skills:**
Required for all Participants. Must include information regarding prior education/training, credentials, prior work experience (see above). If applicable WorkKeys®, WINS® (must be within last 5 years).
- If need for additional assessment is identified through case management: WorkKeys®, WINS®, My Skills My Future (Transferable Skills); SCWOS Self-Assessment Profile - Job Skills, Personal Skills, Work Place Skills may be completed and used to identify matching occupations.

7. **Employability:**
Required for all Participants. Employability information is included in the above listed Assessment Areas (Educational Background, Basic Skills, Occupational Skills, Prior Work Experience) and are based on Interview, SCWOS Objective Assessment Summary, on-going case management and may include formal Assessment of Soft Skills as described below.
- Soft Skills Assessment: WIN Essential Soft Skills Pre-Test. The Lowcountry will use WIN Essential Soft Skills Courseware for Soft-Skills Assessment and as appropriate, subsequent training to enhance Soft-Skills. The WIN Essential Soft Skills Courseware includes a pre-test Assessment for each of the four (4) content areas: Communicating Effectively; Conveying Professionalism; Promoting Teamwork and Collaboration; Thinking Critically and Solving Problems. Each area has its own pre-test and provides various scenarios for the participant to consider and answer multiple choice questions. The pass score is 80% for each section. The pre-test establishes the training plan by assigning the lessons and course instructional content. The assigned case manager follows the individuals and provides additional coaching, counseling, mentoring to assist with their success in attaining a Post Test score of 80% or more in each module.

8. **Interests and Aptitude:**
Required for all Participants. Must include information regarding career interest, skills, and goals.
- If need for additional Assessment is identified through case management: My Next Move, O*NET Interest Profiler; SCOIS; SCWOS Self-Assessment Profile - Interest and Work Values, may be completed and used to identify matching occupations.
9. **Supportive Service needs:**
   Required when individual submits a request for Support Service. Staff must evaluate Need and detail in case notes to include Justification for provision of Support Service. Need and Justification must be detailed on Plan.
   - SCWOS Objective Assessment Summary and staff interview

10. **Developmental needs:**
    Required for all Participants. Must include detailed information regarding Developmental needs.
    - SCWOS Objective Assessment Summary, this information will be gathered as part of the enrollment interview and on-going case management.

Participation in additional assessment and reassessment services will be determined by assigned staff as needed based on the individual, the Plan, and on-going case management.

All formal assessment results must be scanned to the participant file, SCWOS activity data entry must be completed, and if applicable, result must be entered in the appropriate SCWOS designated data collection point (module or tab).

All Assessment must be case noted in detail, including date of Assessment, results, and interpretation of the results to the participant.

Additional formal Assessment tools may be submitted to the Lowcountry Workforce Development Director for approval.

**Definition of Basic Skills Deficient:**
The Lowcountry Workforce Board hereby determines that an individual (youth or adult) 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 if the individual meets any of the following criteria:

- **The individual has English reading, writing, or computing skills at or below the 8th grade level (8.9 or less) as documented on a generally accepted standardized test; or a score of Four (4) or less on the Reading for Information, Applied Mathematics, or Locating Information WorkKeys® assessments; or a score of Four (4) or less on the Work Ready Math, Work Ready Reading, or Work Ready Data WINS® Assessment; or scores NRS Level 4 or below on TABE 11-12 Assessment; or**
- **The individual is enrolled in Title II Adult Education as an English as a Second Language (ESL) student, and/or the individual presents a Best Plus / Best Literacy test (regardless of score) for those who are Limited English Skills proficient.**

**FOR THE ADULT PROGRAM ONLY,** in addition to the above:

- **The individual lacks a High School Diploma or Equivalent; or**

- **The individual is enrolled in Title II Adult Education, including English as a Second Language (ESL) student and excluding stand-alone occupational skills training.**
It is expected that basic skills status will be determined using an objective, valid and reliable assessment, such as the indicators listed herein. However, in the rare instance when a formal evaluation is not available or practical, Staff Documented Observation, customer acknowledgement, and documented case notes are acceptable. For example, the case manager may observe that the adult is experiencing difficulty in reading or filling out an application form, and these difficulties are not due to poor vision; or has poor English language skills and may be appropriate for ESL. However, an individual should not be determined as basic skills deficient merely because he/she lacks soft skills or the occupational skills needed for a particular job. A detailed case note must be entered that identifies (1) why the administration of a formal assessment is not reasonably available or practical, (2) specifically how the individual qualifies as Basic Skills Deficient, and (3) how staff arrived at the conclusion that the administration of a formal assessment was not reasonable or practical. The case note must provide enough detail for an auditable trail back to the source of information verified.

*Self-Certification means an individual’s signed attestation that the information they submit to demonstrate eligibility for a program under title I of WIOA is true and accurate. Where allowable, Self Certification should only be used by exception. In all cases, attempts to gather required documents and a signed detailed statement of self-certification (self-attestation) as to the specific data element and how the individual qualifies must be documented.*

The assessment used to determine Basic Skills Deficient must have a test date (date of test administration) within the last 6 months prior to application. When more than one type of assessment document is presented at application, the most recent (by date) assessment must be used to determine Basic Skills status.

All verification documents regarding an individual’s Basic Skills Status must be maintained in the individual’s eligibility/application file, scanned in SCWOS and completion of data entry on the SCWOS Assessment tab.

Any discrepancies arising between policy and or procedures with federal and state provisions due to current or future revisions will default to the current minimum federal and state regulations and guidance available. Lowcountry policy and or procedures may set forth stricter requirements than provided by federal and state guidance, but in no case will Lowcountry policy and or procedures not meet minimum federal and state policy.

*Exceptions to all policies may be approved by the Lowcountry Workforce Development Director*

**ACTION:** The information provided herein must be reviewed by all Lowcountry Workforce Area Contractors/Service Providers/Sub-recipients/One-Stops; a copy must be maintained in a central location and distributed to all applicable staff.

**CONTACT:** Questions regarding this instruction should be directed to Shelly Campbell, Lowcountry Workforce Investment Area, Lowcountry Council of Governments, Post Office Box 98, Yemassee, SC 29945, scampbell@lowcountrycog.org.

*Attachment I: References*
REFERENCES:

- Workforce Innovation and Opportunity Act of 2014 Public Law 113-128
- Workforce Innovation and Opportunity Act; Final Rule (WIOA DOL Final Rule) published at 81 FR 56071 (August 19, 2016)
- Training and Employment Guidance Letter (TEGL) 19-16 Guidance on Services provided through the Adult and Dislocated Worker Programs under the Workforce Innovation and Opportunity Act (WIOA) and the Wagner-Peyser Act Employment Service (ES), as amended by title III of WIOA, and for Implementation of the WIOA Final Rules
- Training and Employment Guidance Letter (TEGL) 21-16, Third Workforce Innovation and Opportunity Act (WIOA) Title I Youth Formula Program Guidance
- Training and Employment Guidance Letter (TEGL) 18-15, Second Workforce Innovation and Opportunity Act (WIOA) Title I Youth Formula Program Guidance,
- Training and Employment Guidance Letter (TEGL) 23-14, Second Workforce Innovation and Opportunity Act (WIOA) Title I Youth Formula Program Guidance
- Training and Employment Guidance Letter (TEGL) 10-16, Change 1 “Performance Accountability Guidance for Workforce Innovation and Opportunity Act (WIOA) Title I, Title II, Title III and Title IV Core Programs
- State Instruction Letter 15-17, change 3 | Adult Priority of Service under WIOA
- State Instruction Letter 18-01 | Individual Employment Plans
- State Instruction Letter 18-06 | Youth Objective Assessments and Individual Service Strategies
- Training and Employment Guidance Letter (TEGL) 09-22 – Workforce Innovation and Opportunity Act Title I Youth Formula Program Guidance
- State Instruction Letter 20-15, Change 1 | Participant Eligibility for WIOA Title I Programs
- State Instruction Letter 19-05 | WIOA Youth Program Eligibility, Expenditures, and Service Requirements
- State Instruction Letter 20-09 | Performance Data Validation for DOL Workforce Programs
- State Instruction Letter 20-02 | Soft Skills Instruction and Activity Code