

## **Literacy and Numeracy Gains Performance Measure Policy**

### **Reference:**

Workforce Investment Act of 1998 (WIA), Sections 101 and 136; 20 CFR: 666.100; TEGL 17-05; TEGL 17-05, Change 2; Federal Register/Vol. 65, No. 156/Friday, August 11, 2000; Out-of-School Youth policy; Federal Literacy/Numeracy Questions and Answers; Federal Webinar Presentation; TEGL 18-11; TEN 46-11.

### **Background:**

In 2001, the Office of Management and Budget and other Federal agencies developed a set of common performance measures for programs with similar strategic goals. As part of this initiative, the Employment and Training Administration (ETA) of the U.S. Department of Labor issued Training and Employment Guidance Letter (TEGL) 17-05, Common Measures Policy for ETA's Performance Accountability System and Related Performance Issues.

In May of 2009, TEGL 17-05, Change 2 was issued to further clarify the application of the literacy/numeracy measure. There are three common measures that apply to programs serving youth:

- Placement in Employment or Education;
- Attainment of a Degree or Certificate; and
- Literacy and Numeracy Gains.

This policy addresses "Literacy and Numeracy Gains." Educational gain is measured by the National Reporting System, developed by the U.S. Department of Education's Division of Adult Education and Literacy. To maintain consistency with the implementation of the common measures by their Education partner, ETA adopted NRS policies which have been carried forward in this State policy.

In March of 2012, TEGL 18-11 was issued to provide additional guidance to increase literacy and numeracy gains of out-of-school, basic skills deficient youth and to further clarify reporting policies and requirements. TEGL 18-11 did not change or replace any part of Nebraska's "Literacy and Numeracy Gains Performance Measure" policy.

In May 2012, TEN 46-11 was issued which provides a valuable "Youth Program Reference Tool" for utilization by workforce professionals and local Workforce Investment Board Members.

### **Action:**

After the 10 day public review period, this policy is determined final. All programs utilizing NEworks must adhere to this policy. Local WIA areas should communicate and encourage the use of guidance in TEGL 18-11 and TEN 46-11 to all WIA youth services provider staff, local Workforce Investment Board members, and local Youth Council members. TEGL 18-11 may be found at <http://wdr.doleta.gov/directives/attach/TEGL/tegl18-11.pdf> and TEN 46-11 may be found at <http://wdr.doleta.gov/directives/attach/TEN/ten2011/TEN18-11.pdf>. Questions and comments on this policy should be submitted in writing to Jan Fox, Policy Coordinator, [jan.fox@nebraska.gov](mailto:jan.fox@nebraska.gov).

**Policy:**

The literacy and numeracy gains indicator measures the increase in the skills of participants through a common assessment tool administered at program entry and at regular intervals thereafter. Out-of-School youth participants for whom the goal of literacy and/or numeracy gains is most appropriate are those with basic skills deficiencies. Participants who are not basic skills deficient cannot achieve a positive outcome because they have already attained basic literacy and numeracy. Exclusion of individuals who are not basic skills deficient focuses the measure on the participants with the greatest need for remediation, and minimizes the burden of testing individuals who, by virtue of their existing skill level, will not achieve a positive outcome under this measure.

**Performance Measure Definition**

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

$$\frac{\text{\# of youth participants who increase one or more educational functioning levels}}{\text{\# of participants who have completed a year in the youth program (i.e., one year from the date of first youth program service) plus the number of participants who exit before completing a year in the youth program}}$$

**Operational Parameters**

- All out-of-school youth must be assessed (given a 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. 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 assessment tools, 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 assessment 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, 2013.]

- 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 youth 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.
- In-school youth are excluded from this measure.
- In Nebraska, date of first youth program service shall be tracked as the TREX Participation Date until further reporting integration takes place.

### **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:

*Deficient in Basic Literacy Skills* – The definition of "deficient in basic literacy skills" is defined in the local plan, but at the minimum is an individual who:

- computes or solves problems, reads, writes, or speaks English at or below the 8<sup>th</sup> grade level on a generally accepted standardized test or a comparable score on a criterion-referenced test; 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. [§664.205]

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

*Out-of-School Youth* – The term means:

1. an eligible youth who is a school dropout; or
2. an eligible youth who has received a secondary school diploma or its equivalent, but is basic skills deficient, unemployed or underemployed. [Sec. 101(33)]

For reporting purposes, an out-of-school youth is a youth who is not attending school (even if the youth has a high school diploma or its equivalent) or is attending post-secondary school and is basic skills deficient.

### ***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.

*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.

### **Assessment Tool**

Programs must use an assessment procedure comprised of a standardized test or a performance assessment with standardized scoring protocols to measure the increase in skills of individuals.

TEGL 17-05, Change 2 announced that the ABE CLAS-E assessment had been approved by the Department of Education to test the literacy gains of English-as-a-Second-Language (ESL) students. Additionally, the Department of Education approved the Wonderlic assessment for the following educational functioning levels: low intermediate, high intermediate and low adult. The Department of Education has removed ABLE from its list of approved assessments. (Beginning 7/1/09 no new participants who have been tested using ABLE can be reported. Current participants who were initially tested with ABLE shall still be tested with ABLE until exit. No new participants may be tested using ABLE after July 1, 2009.) The new EFL descriptors table providing test benchmarks for education functioning levels reflects these changes and is available at: <http://www.nrsweb.org/pubs/>. Local areas should access the latest National Reporting System Test Benchmarks for EFL at the link above, which reflects the most up-to-date guidance from the Department of Education. The benchmarks are provided as examples of how students functioning at each level would perform on the tests.

It is not necessary for States, grantees, or contractors to use the same assessment tool throughout their jurisdictions. However, programs must adhere to the following in choosing an assessment tool:

- the same assessment tool is administered to the participant for pre-testing and post-testing;
- the assessment tool and its scores must crosswalk directly to the educational functioning levels so that educational gains can be reported in terms of increase in one or more ABE or ESL levels;
- the assessment tool must be listed in the Functioning Level Table (for special circumstances, please contact the State; and
- tests must be administered in a standardized manner throughout the jurisdiction (i.e., used consistently and reliably across programs and producing observable results).

### **Educational Functioning Levels**

Programs must assess participants at intake or within 60 days following the date of first youth program service to determine their initial educational functioning level.

Each ABE and ESL level describes a set of skills and competencies that students entering at that level demonstrate. At a minimum, literacy/numeracy (i.e., math and basic reading/writing) must be assessed. These descriptors provide guidelines for placing participants in educational functioning levels, based on performance on standardized tests. After a participant has completed a uniform, standardized assessment procedure, programs use these descriptors to determine the appropriate initial ABE or ESL level in which to place students. The ABE levels roughly equate to two grade levels.

If a participant is functioning at different levels in reading, writing, numeracy, speaking, listening, functional, and workplace areas, the individual is placed in different ABE and ESL levels across the functioning areas. In the post-test assessment, if the participant demonstrates an increase to the next functioning level in any of the areas – reading, writing, numeracy, speaking, listening, functional, and workplace areas – he/she has made an educational gain and should be included in the numerator.

### **Testing Interval**

Participants identified as basic skills deficient must be post-tested at least once by the end of year one following the individual's date of first youth program service. If more than one assessment is administered after the initial test, the latest assessment 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.

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.

### **Testing Youth with Disabilities**

When administering assessment tools, individuals with disabilities are to be provided with reasonable accommodations, as appropriate, according to: Section 188 of the Workforce Investment Act of 1998; 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 test; and State laws or policy. Nebraska's WIA policy on Equal Opportunity and Nondiscrimination discusses the necessity of providing reasonable accommodations.

In the assessment context, accommodations are changes made to the materials or procedures used for the assessment. This is done in order to "level the playing field" and to

ensure 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 the appropriate accommodations be provided for the assessment process so the gains achieved by these youth can be determined accurately.

This may mean:

- providing Braille versions of the test;
- allowing for the oral reading of the directions or test questions;
- allowing for the test to be taken in a different setting;
- permitting frequent breaks;
- extending the amount of time generally provided for completion of the test; etc.

It is expected that most youth with disabilities can and should be assessed using tests specifically designed to crosswalk to the educational functioning levels, with the use of accommodations where needed. However, 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. In those rare instances, service providers may use alternate assessment tools if those alternate tools have been deemed by the State to provide valid and reliable indicators of information comparable to the information provided through the educational functioning levels. Such alternate tools may include, but are not limited to: portfolio assessments; one-on-one performance assessments; and alternative standardized tests. If such alternative assessment tools are used, the State should determine, based on the type of assessment, what constitutes a successful gain for this measure. It is advisable that youth professionals receive specific guidance and training in the administration of alternate assessments to youth with disabilities to ensure they have the necessary skills and knowledge to appropriately administer the tests and accurately interpret results.

### **Reporting**

The Literacy and Numeracy Gains Measure is a performance measure required for federal reporting beginning July 1, 2006 for those out-of-school youth who are basic skills deficient and whose first youth program service is on or after July 1, 2006.

### **Exclusions**

Participants in the following categories, either at the time of exit or during the three-quarter measurement period following the exit quarter, will be excluded from the computation of this measure:

- Institutionalized (Code 21) – The participant is residing in an institution or facility providing 24-hour support, such as a prison or hospital, and is expected to remain in that institution for at least 90 days. Individuals with disabilities (as defined in 29 CFR 37.4) residing in institutions, nursing homes, or other residential environments cannot be excluded under this reason.
- Health/Medical (Code 22) or Family Care (Code 27) – The participant is receiving medical treatment or providing care for a family member with a health/medical condition that precludes entry into unsubsidized employment or continued participation in the program. This does not include temporary conditions or situations expected to last for less than 90 days.
- Deceased (Code 23) – Self-Explanatory.
- Reservists Called to Active Duty (Code 26) – The participant is a member of the National Guard or a military Reserve unit and is called to active duty for at least 90 days.

- Relocated to a Mandated Program (Code 28) – The participant is in the foster care system or another mandated (residential or non-residential) program and has moved from the area as part of such a program. This does not include relocation to a Job Corps center.
- Invalid or Missing Social Security Number (Code 29) –The participant either disclosed an invalid social security number (SSN) or chose not to disclose a SSN.

### **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 that the test occurred within six months of enrollment. [Note: The same standardized test must be used for both pre and post assessments.]

This measure does recognize joint participation in WIA services and non-WIA funded training programs when the WIA or non-WIA partner training activities are coordinated with the individual's WIA Title I-B activities through a formal co-enrollment. The concurrent enrollment must be included in the individual's WIA service plan.

### **Documentation**

All data and methods used to determine literacy and numeracy gains must be documented in NEworks and are subject to audit. Results of pre-tests, progress tests and post-tests along with information on the name of the assessment instrument used and dates of testing should be kept on file with documentation. Although progress test scores can be documented in the NEworks file, only pre- and post-test scores will be included for federal reporting performance.

When special accommodations are made for youth with disabilities, the file documentation must include:

- diagnosis of the learning disability or disabilities or, diagnosis of ADHD;
- statement of how this disability substantially limits the youth's activity;
- recommendation for accommodation(s) appropriate for the individual's educational needs; and
- listing of the actual accommodation(s) made.