

# Washington State WorkSource System Policy

---

**Policy Number:** 1011, Revision 7

**Policy Title:** Determining Basic Skills Deficiency

**Effective Date:** TBD 2025

## 1. Purpose:

To outline all allowable forms of staff observation, documents and assessments and to determine Basic Skills Deficiency (BSD) for customers receiving individualized career services in any of the following programs: Wagner-Peyser, WIOA Adult, WIOA Dislocated Worker, WIOA Youth, Dislocated Worker Grant (DWG), Trade Adjustment Assistance (TAA), National Farmworker Jobs, and Jobs for Veterans' State Grant (JVSG) programs. This policy identifies all allowable assessments, reporting requirements, and accommodation requests for assessing customers with disabilities.

This revision allows for staff observation and expands allowable assessments in determining basic skills deficiency.

## 2. Background:

Across all titles, WIOA focuses on services to "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** (see definition section 4).

Local area staff, including Title I-B and Wagner-Peyser programs, that evaluate applicants for Individualized Career Services, must assess those individuals for basic skills deficiencies when determining eligibility for a program and must accurately record this information in the state's Management Information System (MIS). This ensures that customers who are basic skills deficient receive priority service, the support they need, and ensures the state and local areas are fairly evaluated on their performance outcomes. The U.S. Department of Labor considers barriers like Basic Skills Deficiency, low income, and disability when assessing each state's success in the core WIOA Federal Performance Measures. If workers with barriers aren't properly documented at enrollment, the participant may be held to unfairly high-performance standards. (see TEGL 11-19, Revision 1, 20 CFR 677.170(c), and 34 CFR 361.170(c) for further information). See the [Eligibility Handbook](#) for further details on how to record and document basic skills deficiency.

Assessments recognized by the US Department of Education's National Reporting System (NRS) are tests to measure basic academic skills, but do not measure vocational skills or

advanced technical skills. Other tests or assessments are appropriate for such purposes, and this policy does not limit the appropriate use of other such assessments for those purposes.

### 3. **Policy:**

Per TEGL 23-19, Change 2, and PIRL requirements, all customers entering the WorkSource System must be assessed for basic skills deficiency. Staff must, at a minimum - at participant program entry - complete an assessment determining if the following applies to each customer:

- (a) An individual who has English reading, writing, or computing skills at or below the 8th grade level on a generally accepted standardized test; or
- (b) An individual who 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.

The State Workforce Development Board, in action taken on June 18, 2025, approved the assessments indicated in section 3.a. as standard tools to determine Basic Skills Deficiency (BSD) used for reporting and for program enrollment of:

#### Youth:

- WIOA Out-of-School Youth (OSY) who have a high school diploma or its equivalent, are low income and Basic Skills Deficient or English Language Learners
- WIOA In-School Youth (ISY) who are Basic Skills Deficient

#### Adult:

- WIOA Adult Priority of Service categories 1 and 2 (*priority must be implemented regardless of the amount of funds available to provide services in the local area*):
  1. Covered persons (veterans and eligible spouses) who are low income, recipients of public assistance, or basic skills deficient
  2. Individuals (non-covered persons) who are low income, recipients of public assistance, or basic skills deficient.

While the following methods for determining BSD, cited in TEGL 21-16, are specific to Youth, the State has adopted these guidelines for all programs.

#### **a. Staff Observation for Determining BSD**

According to 20 CFR 681.290, the Local WDB must establish a policy defining on who is considered BSD due to being 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. Local policy may include additional definitions on who is considered BSD if the local policy does not contradict state policy.

In addition to using formal assessments, the state has determined that through observation, folder reviews, or interviews, the following alternative means are allowed to be used to establish BSD:

- Secondary school transcript with a failing grade in math or reading within the past 6 months.

- Verification of enrollment in WIOA Title II.
- School records showing test scores from a generally accepted standardized test within the last year showing grade level at 8.9 or lower (8<sup>th</sup> grade, 9<sup>th</sup> month) (or a detailed case note, if verified verbally with appropriate entity).
- Acceptable proof of staff observed basic skills deficiency, which must include a case note that indicates a customer has at least one of the following barriers:
  - Unable to follow basic written instructions or diagrams without help.
  - Cannot fill out basic forms or job applications without help.
  - Cannot add, subtract, multiply or divide whole numbers to 3 digits without the use of a calculator.
  - Cannot do basic tasks on a computer without help.
  - Does not speak or read English well enough to get or keep a job or function in society.

Note: Per DOL guidance, lack of a high school diploma or GED *alone* is NOT sufficient to demonstrate basic skills deficiency.

## **b. English Language Learners**

Per WIOA Section 203(7), individuals who are English Language Learners meet the criteria for BSD and must be included in the priority populations for the WIOA Title I-B Adult Program. An Individual who is an English language learner qualifies as being basic skills deficient.

Documentation must detail that the individual has limited ability to read, write, speak, or comprehend the English language, and

- A. their native language is a language other than English; or
- B. they live in a family or community environment where a language other than English is the dominant language.

The following are allowable forms of documentation to prove ELL:

- Assessment Test Results (see below)
- Applicable Records from Education Institution (transcripts, or other school documentation)
- Intake Application or Enrollment Form
- Individual Service Strategy
- Case notes
- Self-Attestation

While not required, acceptable English as a Second Language (ESL) tests are:

- BEST - Literacy 2.0
- BEST Plus - 3.0
- CASAS Reading STEPS
- CASAS Listening STEPS
- TABE CLAS-E

Note: See [Assessment | NRSWeb](#) for further detail on form numbers, scores, and NRS expiration dates.

### **c. Using Formal Assessments That Are Not NRS-Approved for Determining BSD**

Local programs are not required to use assessments approved for use in the Department of Education's NRS, nor are they required to determine an individual's grade level equivalent or educational functioning level (EFL). Rather, local programs may use other formalized testing instruments designed to measure skills-related gains. It is important that, in addition to being valid and reliable, any formalized test used be appropriate, fair, cost effective, well-matched to the test administrator's qualifications, and easy to administer and interpret results.

However, if measuring EFL gains after program enrollment under the measurable skill gains indicator, local programs must use an NRS-approved assessment for both the EFL pre- and post-test to determine an individual's educational functioning level.

### **d. NRS-Approved Assessments for Determining BSD**

The National Reporting System (NRS) determines tests suitable for use and the period for which that use is approved. Any NRS-approved exam with a test score indicating an educational functioning level (EFL) of 8.9 or below qualifies customers as BSD. Test scores are valid if a customer has taken any of these assessments within 6 months of their enrollment date. Local Boards may allow properly trained local area staff to administer these assessments or determine it is more appropriate for a Title II partner to conduct the NRS-approved assessments. LWDBs are subject to all test administration and security requirements if they choose to implement and must also ensure compliance of any subrecipient who administers assessments.

**The following NRS-approved assessments may be used in Washington effective June 18, 2025:**

- **ACT WorkKeys (Workplace Documents, Applied Mathematics)**
- **CASAS (Reading GOALS, Math GOALS 2)**
- **TABE (11/12 and 13/14)**
- **MAPT-CCR for Reading, MAPT-CCR for Mathematics**

These assessments meet the NRS requirements and:

1. Are appropriate for measuring literacy and language development of adult students/job seekers,
2. Have standardized administration and scoring procedures,
3. Have alternate, equivalent forms for pre- and post-testing, and
4. Have evidence linking them to the NRS Educational Functioning Levels.

**Note: See [Assessment | NRSWeb](#) for further detail on form numbers, scores, and NRS expiration dates.**

### **e. Accommodations for Participants with Disabilities or Special Needs**

For assessing skills and interests outside of basic skills, local programs must use assessment instruments that are valid and appropriate for the target population and must provide reasonable accommodation in the assessment process, as needed, for individuals with disabilities.

Local providers must ensure that all participants with disabilities have equal access to test accommodations, have equal opportunities to test, and receive equal treatment in testing situations. Each provider must follow the Americans with Disabilities Act (ADA) processes and procedures set forth at their organization in determining how to best serve participants with documented disabilities. However, participants are not required to reveal their disability and may elect to participate in a program without special accommodations.

#### 4. **Definitions:**

**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 computer skills at or below the 8<sup>th</sup> 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.

#### 5. **References:**

- National Reporting System (NRS) State Assessment Policy Guidance in [34 CFR 462](#) Subpart D, revised March 25, 2024
- [20 CFR 677.170](#) [20 CFR 677.170\(c\)](#) and 34 CFR 361.170(c)
- [TEGL 11-19 Change 2](#)
- [TEGL 19-16](#)
- [TEGL 21-16](#)

#### 6. **Supersedes:**

WorkSource System Policy 1011, Revision 6 - CASAS for Basic Skills Deficiency

#### 7. **Website:**

[Workforce Professionals Center](#)

#### 8. **Action:**

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

#### 9. **Attachments:**

None

#### **Direct Inquiries To:**

*Employment System Administration and Policy  
Employment System Policy and Integrity Division  
Employment Security Department  
P.O. Box 9046  
Olympia, WA 98507-9046*

