**WIOA Young Adult Program**

**Chapter 15: Measurable Skills Gain –Educational Functioning Level (EFL)**

Summary

This policy provides background on when (or if) to use testing results from approved basic skills tests as a way to meet the Measurable Skills Gain (MSG) performance indicator for WIOA Youth participants ONLY.

Relevant Laws, Rules or Policies

[WIOA Participant Individual Record Layout (PIRL)](https://www.doleta.gov/performance/reporting/#current-reporting-req)

[Workforce Innovation and Opportunity Act (Public Law 113-128)](http://www.gpo.gov/fdsys/pkg/PLAW-113publ128/html/PLAW-113publ128.htm)

[WIOA Final Rule (Dated 08-19-2016)](https://www.gpo.gov/fdsys/pkg/FR-2016-08-19/pdf/2016-15975.pdf)

[WIOA Final Rule: Unified and Combined State Plans, Performance Accountability, and the One-Stop System Joint Provisions (Dated 08-19-2016)](https://www.gpo.gov/fdsys/pkg/FR-2016-08-19/pdf/2016-15977.pdf)

[U.S. Dept. of Labor Training and Employment Guidance Letter No. 10-16 Change 1 (Dated 8-23-17)](https://wdr.doleta.gov/directives/corr_doc.cfm?docn=3255)

[U.S. Dept. of Labor Training and Employment Guidance Letter No. 21-16 (Dated 3-2-17)](https://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=7159)

[National Reporting System for Adult Education, NRS Test Benchmarks, August, 2019](https://nrsweb.org/resources/test-benchmarks-nrs-educational-functioning-levels-efl-updated-august-2019)

[U.S. Dept. of Labor Training and Employment Notice No. 22-19 (Dated 4-3-20)](https://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=8754)

[Office of Management and Budget Code of Federal Regulations 2 CFR 200](https://gov.ecfr.io/cgi-bin/text-idx?SID=970b58af63fde7ba10fd201add7ec48c&mc=true&tpl=/ecfrbrowse/Title02/2cfr200_main_02.tpl) (Uniform Guidance)

[U.S. Dept. of Labor Training and Employment Notice No. 12-21 (Dated 10-15-21)](https://wdr.doleta.gov/directives/corr_doc.cfm?docn=9977)

[U.S. Dept. of Labor Training and Employment Notice No. 14-21 (Dated 10-27-21)](https://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=6118)

[U.S. Dept. of Labor Training and Employment Notice No. 18-21 (Dated 1-4-22)](https://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=3439)

[2018 WIOA Core Monitoring Guide](https://doleta.gov/grants/pdf/2018_Core_Monitoring_Guide.pdf)

[U.S. Dept. of Labor Training and Employment Guidance Letter No. 10-16, Change 2 (Dated 9-15-22)](https://www.dol.gov/sites/dolgov/files/ETA/advisories/TEGL/2022/TEGL%2010-16%20Change%202/TEGL%2010-16%20Change%202.pdf)

[U.S. Dept. of Labor Training and Employment Guidance Letter No. 23-19, Change 1 (Dated 10-25-22](https://www.dol.gov/sites/dolgov/files/ETA/advisories/TEGL/2019/TEGL%2023-19%20Change%201/TEGL%2023-19%2C%20Change%201%20%28Complete%20document%29.pdf))

[U.S. Dept. of Labor Training and Employment Guidance Letter No. 9-22 (Dated March 2, 2023)](https://www.dol.gov/agencies/eta/advisories/tegl-09-22)

[U.S. Dept. of Labor Training and Employment Guidance Letter No. 23-19, Change 2 (Dated 5-12-23)](https://www.dol.gov/agencies/eta/advisories/tegl-23-19-change-2)

[Federal Register](https://www.federalregister.gov/documents/2023/07/13/2023-14825/tests-determined-to) July 13.2023

[Minnesota assessment policy](http://mnabe.org/abe-law-policy/mn-abe-policies), October 31, 2023

Effective Date

10/31/2023

Last Updated

11/07/2023

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Policy

**Action Required**

Local Workforce Development Areas (WDAs) have five different options under the WIOA Measurable Skills Gain performance measure for a participant to be counted in the numerator. One available option is “Documented achievement of at least one educational functioning level of a participant who is receiving instruction below the postsecondary education level.”

This policy focuses ONLY on Educational Functioning Levels (EFLs) as part of the Measurable Skills Gain performance measure for WIOA Youth. Please note that information relating to using EFL gain under the Measurable Skills Gain performance measure may be subject to data validation requirements.

**Background**

The concept of using EFLs as a performance measure was initially introduced in 2004 under the Workforce Investment Act (WIA). Beginning in 2005, any new youth participant who was out of school at the time of enrollment was required to take a basic skills test using one of the National Reporting System (NRS) approved testing instruments. This only applied to WIA youth who were out of school at the time of enrollment—no other WIA Title I programs had this requirement.

Under WIOA, however, the Measurable Skill Gain performance measure not only applies to all programs within Title I, but is also included in the other titles as well. Since these new WIOA measures apply across multiple titles, a participant enrolled in one (or possibly more) programs only has to achieve a “positive” outcome on at least one of the five possible choices. There are other substantive differences between the old WIA “literacy/numeracy” measure and the new “Measurable Skills Gain” measure under WIOA. These changes may impact program staff working with participants under the WIOA Youth Formula Grant Program.

**Operational Concepts under WIOA**

Substantive changes from previous practice under WIA include the following:

* WIOA Youth participants who are included in the Measurable Skill Gain performance measure include ALL ISY attending secondary OR postsecondary school. Only those out-of-school youth (OSY) who meet one or more of the criteria below are included in the MSG calculation:
  1. OSY participants with an open Occupational Skills Training activity;
  2. OSY participants returning to secondary education at or above the 9th grade level during participation in the WIOA Youth Program;
  3. OSY participants who enroll into postsecondary education during participation in the WIOA Youth Program;
  4. OSY participants enrolled in a Title II-funded adult education at or above the 9th grade level during participation in the WIOA Youth Program;
  5. OSY participants who are also participants in a federally-funded YouthBuild Program (does NOT include state-funded Youthbuild programs); and,
  6. OSY participants enrolled in Job Corps during participation in the WIOA Youth Program
* **IMPORTANT:** WIOA Youth participants included in the WIOA Youth MSG denominator and who are co-enrolled in other WIOA Title I, Title II and Title IV programs MAY also be included in the MSG for those programs. Please consult appropriate policy(ies) from the other programs to determine whether or not a co-enrolled WIOA Youth is included in the other program(s) MSG denominator.
* For purposes of ONLY the basic skills assessment portion of the objective assessment, local programs are NOT required to use assessments approved for use in the NRS, nor are they required to determine an individual’s grade level equivalent or EFL, although use of these tools are permitted. (TEGL 21-16, p8)
* Local service providers may opt to use other formalized testing instruments to measure skills-related gains. It is also important that, in addition to being valid and reliable, any formalized testing used be appropriate, fair, cost-effective, matched to the test administrator’s qualifications, and easy to administer and interpret. (TEGL 21-16, p8)
* Alternatively, skills related gains may also be determined through less formal alternative assessment techniques such as observation, folder reviews, or interviews. Interviews may be particularly appropriate for youth with disabilities given accessibility issues related to formalized instruments. (TEGL 21-16, p8)
* Outside of use as part of the objective assessment as described previously, if a local program wants to measure EFL gains after enrollment under the MSG performance measure, the local program can only use one of the NRS-approved assessments. The pre-test and post-test must use the same testing tool. (TEGL 21-16, p8).

If a WIOA service provider intends to administer pre- and post-testing of WIOA Title I participants towards meeting the EFL gain component of the Measurable Skill Gain performance measure, it needs to use only acceptable testing instruments as detailed by the National Reporting System’s latest issuance in July 2023 [Federal Register](https://www.federalregister.gov/documents/2023/07/13/2023-14825/tests-determined-to) and issued by the Minnesota Department of Education . [Minnesota assessment policy](http://mnabe.org/abe-law-policy/mn-abe-policies)

Minnesota has authorized the BEST Plus, CASAS, and TABE standardized assessments for use in establishing NRS educational functioning levels. Additionally, assessments within these test systems:

* Are appropriate for measuring literacy and language development of adult learners
* Have standardized administration and scoring procedures
* Have alternate, equivalent, forms for pre- and post-testing
* Have evidence linking them to the NRS Educational Functioning Levels

### BEST Plus 3.0

*For Levels:* ***ESL 1-6***

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| ***Name/Series*** | ***Content*** | ***Format*** | ***Forms/Levels*** | ***Usage Date*** |
| **Basic English Skills Test (BEST) Plus 3.0** | ESL | Computer-Adaptive and Form,  Paper Form | 1 and 2 | Now–July 13, 2030 |

### CASAS

*For Levels:* ***ABE 1-6***

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| ***Name/Series*** | ***Content*** | ***Format*** | ***Forms/Levels*** | ***Usage Date*** |
| **GOALS** | Reading | Computer Form,  Paper Form | 901R–908R | Now–June 30, 2025\* |
| **Math GOALS 2** | Math | Computer Form,  Paper Form | 921M-930M | Now–July 13, 2030 |

*For Levels:* ***ESL 1-6***

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| ***Name/Series*** | ***Content*** | ***Format*** | ***Forms/Levels*** | ***Usage Date*** |
| **Listening STEPS** | Listening | Computer Form,  Paper Form with CD | 621L-630L | Now–July 13, 2030 |
| **Reading STEPS** | Reading | Computer Form,  Paper Form | 621R-630R | Now–July 13, 2030 |

### TABE

*For Levels:* ***ABE 1-6***

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| ***Name/Series*** | ***Content*** | ***Format*** | ***Forms/Levels*** | ***Usage Date*** |
| **11 and 12** | * Reading * Math * Language | Computer Form,  Paper Form | L (Literacy)  E (Easy)  M (Medium)  D (Difficult)  A (Advanced) | Now–June 30, 2025\* |

*\*Notes about Usage Date: 1. The federal approval date may end midyear, but providers are typically allowed to use the test through the end of the federal reporting year, which ends June 30; and 2. Usage Date could be extended, if the U.S. Department of Education extends the approved usage dates.*

* Local program staff may measure EFL gains one of three ways:  
  1. Compare the participant’s initial EFL, as measured by a pre-test, with his or her EFL as measured by a post-test;
  2. Adult high-school programs that lead to a secondary school diploma or equivalent may measure and report educational gain through the awarding of credits or Carnegie units; or,
  3. Reporting an EFL for participants who exit a program below the postsecondary level and enroll in postsecondary education and training during the program year (between 7/1 and 6/30 of the following year). A program below the postsecondary level applies to participants enrolled in a basic education program. (TEGL 10-16, Change 1, p19)
* For in-school youth enrolled in secondary education, local programs may use Minnesota Comprehensive Assessment (MCA) test results to satisfy the basic skills assessment portion of the objective assessment process.
* Local programs may use previous basic skills assessment results if such previous assessments have been conducted within the last six months.
* Under WIOA, if the local service provider wants to use the EFL gain as a way for a participant to be included in the Measurable Skills Gain numerator, a post-test that documents a gain of at least one EFL must occur on or before June 30 using the same testing instrument.  
    
  **IMPORTANT NOTE:** EFL gain is just one of five different ways for the participant to be included in the MSG numerator. Whether or not a local program operator chooses to use (or not use) the EFL gain approach is decided on a local, case-by-case basis. The participant will only be counted once in the numerator and/or denominator and only needs to satisfy one of the five available methods to be counted in the numerator. Information collected and documented in Workforce One may be subject to data validation requirements.