



## Determining Basic Skills Deficiency Policy #3045

Date of Original Policy: 12/09/2025

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### PURPOSE

To outline all allowable forms of staff observation, documents, and assessments to determine Basic Skills Deficiency (BSD) for individuals 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 individuals with disabilities.

This revision allows for staff observation and expands allowable assessments in determining BSD.

### 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 below).

Southwest Washington Workforce Development Area by which oversight is provided by Workforce Southwest Washington, Subrecipient staff including Title I-B and Wagner-Peyser programs, that evaluate applicants for individualized career services or training 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 individuals who are determined to be basic skills deficient receive priority service, the support they need, and the state and local areas are fairly evaluated on their performance outcomes. The U.S. Department of Labor considers barriers like BSD, low-income status, 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, Change 2, 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 BSD.

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.

## **POLICY**

Per [TEGL 23-19, Change 2](#) and PIRL requirements, all individuals receiving individualized career or training services must be assessed for BSD at program entry. Staff must, at a minimum, complete an assessment determining if the following applies to each individual:

- 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.

\*Note: "In the individual's family" refers to the individual's ability to perform essential literacy or numeracy tasks related to family responsibilities (e.g., reading school communications and managing household finances). This does not authorize or require an assessment of the family unit or household environment.

The State Workforce Development Board, in action taken on June 18, 2025, approved the methods and assessments as standard tools to determine BSD used for reporting and for eligibility criteria for enrollment in:

### **Title I Youth:**

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

### **Title I 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 BSD
  - 2) Individuals (non-covered persons) who are low income, recipients of public assistance, or BSD.

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. Although Washington does not have a priority of service policy for Dislocated Worker program of enrollment, all individuals receiving Dislocated Worker individualized career or training services will also be assessed, through at least staff interview and observation, for basic skills deficiency.

## **A. School Records or Staff Observation for Determining BSD**

The state has determined that, through observation, folder reviews, or interviews, the following alternative means are allowed to be used to document 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 the appropriate entity).
- Acceptable proof of staff observed BSD, which must include a case note that indicates an individual 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 up to 3 digits without the use of a calculator.
  - Cannot do basic tasks on a computer without help.
  - Does not or read, write, or speak English at a level necessary to function on the job, in the individual's family, or in society (see \*Note regarding: “in the individual’s family”. above)

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

## **B. English Language Learners**

Per [WIOA Section 203\(7\)](#), individuals who are English Language Learners (ELL) 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 ELL qualifies as being BSD.

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

- 1) their native language is a language other than English; or
- 2) 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 an 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 details 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. WSW Subrecipient's must receive written approval from WSW Program Manager to use an assessment not identified in the policy prior to assessing the individual.

However, if measuring EFL gains after program enrollment under the measurable skill gains indicator (WIOA common measure), Subrecipient 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 EFL of 8.9 or below qualifies individuals as BSD. Test scores are valid if an individual has taken any of these assessments within 6 months of their enrollment date. WSW may allow properly trained local area staff to administer these assessments or determine whether it is more appropriate for a Title II partner to conduct the NRS-approved assessments. WSW is subject to all test administration and security requirements if they choose to implement and must also ensure compliance of any subrecipient who administers assessments. WSW Subrecipients must receive written approval and suitable training from WSW before administering NRS approved assessments.

The following NRS-approved assessments may be used in Washington **effective January 1, 2026**:

- 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:

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

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

NOTE: Staff must not upload into the case management system or retain in hard files any CASAS document(s) that contain test questions or other sensitive testing information (see [www.CASAS.org](http://www.CASAS.org)'s test security policy). Other assessments may not have this

restriction and may allow uploading of test score summary.

## **E. Accommodation for Participants with Disabilities or Special Needs**

For assessing skills and interests outside of basic skills, Subrecipients must use methods and 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.

Subrecipients must ensure that all participants with disabilities have equal access to test accommodation, have equal opportunities to test, and receive equal treatment in testing situations. Subrecipient 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 accommodation.

## **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. (see \*Note regarding: “in the individual’s family” above).

## **REFERENCES/RESOURCES**

- 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](#)
- [ESD Determining Basic Skills Deficiency Policy 1011 Rev 7](#)

## **WEBSITE**

<http://workforcesw.org/providers#OperationsPolicies>

## **INQUIRIES**

Please contact Marnie Farness at [mfarness@workforcesw.org](mailto:mfarness@workforcesw.org) or (360) 559-5090 for questions.