



## CATAWBA LOCAL INSTRUCTION 24-05

**TO:** Catawba Workforce Development Area  
**SUBJECT:** Guidance on Determining Basic Skills Deficiency  
**ISSUE DATE:** 08/23/2024  
**EFFECTIVE DATE:** 07/01/2024  
**UPDATED:** 05/12/2025  
**EXPIRATION:** 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 Catawba region.
- to define Basic Skills Deficient

**Background:** The Workforce Innovation and Opportunity Act (WIOA) Adult Program eligibility requirements remain mostly consistent with Workforce Investment Act (WIA), but include significant changes to the service priority provisions. Consistent with WIA, priority for Adult Program services must be given to recipients of public assistance and other low-income individuals, with added priority for individuals who are basic skills deficient. Under WIOA this priority applies only when Adult Program funds are restricted. Under WIOA, however, priority access to services by members of this group (public assistance recipients, other low-income groups) applies automatically for 75%. Per Training and Employment Guidance Letter (TEGL 3-15), Adult Program applicants must meet basic eligibility requirements and any other service priority criteria in effect for the local region.

**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 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 below for the state definition of Basic Skills Deficient.

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 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 uploaded in SCWOS). WIN assessments must be within 5 years and TABE assessment must be within 6 months.

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 entered in SCWOS as applicable. The following activities must be entered when assessment is given after enrollment: 413 (Youth) & 203 (Adult/DW).

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

State definition of Basic Skills Deficient:

### 1. Basic Skills Status:

- a. **Required for all Youth Eligibility Determinations.**
- b. Required for Adult and Dislocated Worker Eligibility determinations. (75% Adult Priority must be met) **Note: Participant enrolled as a GED participant, reversed OJT and IWT do not require assessments. If an adult is over income and/or under employed, an assessment is required to determine priority of service. This rule applies to participant determine eligible for both Adult and Dislocated worker funding streams.**
- 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.**

**2. Occupational Skills:**

TABE or WIN is required for all Participants seeking training. Must include information regarding prior education/training, credentials, prior work experience (see above). WorkKeys or WIN results must be completed within the past 5 years.

If need for additional assessment is identified through case management: WorkKeys®, WINS®, My Skills My Future (Transferrable Skills); SCWOS Self-Assessment Profile - Job Skills, Personal Skills, Workplace Skills may be completed and used to identify matching occupations.

**3. 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. A thorough assessment must be completed and utilization of partner agencies, if needed.

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 Catawba Workforce Development Administrator for approval.

**Documentation Requirements:**

It is beneficial to capture all applicable priority of service categories to reflect efforts in serving those most in need. In addition, such characteristics will likely have a positive impact on future performance negotiations as the statistical adjustment model is implemented. Therefore, all applicable priority of service criteria should be recorded in SC Works Online Services (SCWOS). The documentation required for each criteria recorded must be maintained in the participant's file.

**Definition of Basic Skills Deficient:**

The Catawba Regional 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 or less) as documented on a generally accepted standardized test;*
- *Scores a (4) or less on the Reading for Information, Applied Mathematics, or Locating Information WorkKeys® assessments;*
- *Scores of two (2) or less on the Work Ready Math, Work Ready Reading, or Work Ready Data WIN® Assessment;*
- *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.*

**FOR THE ADULT/DWPROGRAM, 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-attestation should only be used by exception. In all cases, attempts to gather required documents and a signed detailed statement of 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. Catawba policy and or procedures may set forth stricter requirements than provided by federal and state guidance, but in no case will Catawba policy and or procedures not meet minimum federal and state policy

**In Summary:** All Adults/Dislocated workers must be assessed using WIN/TABE after eligibility to determine priority of service, if they are over the income, under-employed, or seeking training services. Results must be entered in the Assessment tab and uploaded in SCWOS. A case note must be entered clearly stating the date of assessment and results. WIN or WorkKeys scores 5 years or less can be honored. An individual who has a High School Diploma could still be determined BSD.

**Exceptions to all policies must be approved in writing by the Catawba Workforce Development Administrator.**

**ACTION:** The information provided herein must be reviewed by all Catawba 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 Amanda Baker at 803-327-9041 or [abaker@catawbacog.org](mailto:abaker@catawbacog.org).

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Amanda Baker  
WIOA Administrator

- Attachment I: References

## 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) 16-16, "One-Stop Operations Guidance for the American Job Center Network,"
- Training and Employment Guidance Letter (TEGL) 19-14, "Vision for the Workforce System and Initial Implementation of the Workforce Innovation and Opportunity Act," dated February 19,2015.
- 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
- Training and Employment Guidance Letter (TEGL) No. 23-19 Change I: Guidance for Validating Required Performance Data Submitted by Grant Recipients of U.S. Department of Labor (DOL) Workforce Programs
- State Instruction Letter 20-15, Change 1 | Participant Eligibility for WIOA Title I Programs
- State Instruction Letter 19-05, Change 1 | WIOA Youth Program Guidance
- State Instruction Letter 20-09 | Performance Data Validation for DOL Workforce Programs