

**To:** Indiana’s Workforce System

**From:** Indiana Department of Workforce Development (DWD)

**Date:** May 24, 2024

**Subject:** DWD Policy 2017-13, Change 3  
Educational Functioning Level Assessment Policy

---

## Purpose

This policy describes the standard assessment procedure for adult education providers and WorkOne/American Job Center (WorkOne/AJC) office staff regarding measurement of educational functioning levels (EFLs), test administration, proctor training requirements, and acceptable testing accommodations. Although WorkOne/AJC office staff are not required to administer EFL assessments, WorkOne/AJC office staff who choose to administer these assessments must adhere to this policy.

## Change 3 Summary

This policy change reinstates the TABE CLAS-E assessment for English language learners (ELL) that may be administered to measure educational gain as required by the National Reporting System (NRS) for adult education. The policy also allows hours toward a post-test to begin counting immediately after the test rather than on the next attendance day after the test.

## Rescission

DWD Policy 2017-13, Change 2 *Educational Functioning Level Assessment Policy*

## References

See **Attachment A**.

## Content

### *Need for Assessment Testing*

Educational gain reporting is required by the NRS, the federal accountability system for the Adult Education and Family Literacy Act, Title II of WIOA. A state’s EFL assessment is federally reviewed and approved to ensure that it is suitable to be used when measuring a student’s EFL in alignment with NRS guidelines. The state of Indiana has chosen the **Tests of Adult Basic Education (TABE)**, **TABE Complete Language Assessment System - English (TABE CLAS-E)**, and **ACT WorkKeys** as its approved assessments for measuring and reporting EFLs. These are the only tests to be used for this purpose.

One overarching goal of adult education programs is to improve the literacy skills of participants, and one way to demonstrate program effectiveness is through educational gain. Ongoing assessment is

essential to ensure that all students are placed in the appropriate levels of instruction and are proficient. Standardized assessments measure a student's progress, certify mastery at specific levels of instruction, and drive program quality, professional development, and performance targets. Additionally, the implementation of a uniform policy allows for comparability across programs, and, with the implementation of performance-based funding, a uniform policy helps ensure this standardization.

To accurately measure progress, the assessment must be valid and reliable. Validity is related to the accuracy of measurement, i.e., the extent to which the instrument measures what it is intended to measure. Reliability is the degree of consistency in performance on an assessment, i.e., the extent to which a student would be expected to perform similarly during multiple administrations of the instrument or under different conditions.

### ***Purposes and Use of the Assessment***

Standardized administration and scoring of the assessment, which specify score ranges tied to EFLs, allow for placement and reporting educational gains. EFLs are used by adult education providers to evaluate a student's academic progress through regular testing. This progression is then used to evaluate an adult education provider's success in achieving student skill gains. Additionally, TABE, TABE CLAS-E, and ACT WorkKeys results are used by WorkOne/AJC office staff to gauge a customer's basic skills deficiencies, readiness for training, and/or need for referral to adult education.

The NRS approach to educational gains is to define a set of EFLs at which students are initially placed based on their abilities to perform literacy-related tasks in specific content areas. After a set number of attendance hours in adult education, students are again assessed to determine their skill levels. If a student's skill levels have improved sufficiently to be placed one or more levels higher, the student has achieved a measurable skill gain. Additionally, informal assessments such as teacher-made tests, unit tests, and student observations are encouraged to monitor learning and to inform instruction on an ongoing basis.

### ***Summary and Overview of Assessment Testing***

#### **Tests of Adult Basic Education (TABE)**

**TABE forms 11 & 12** are approved for all learners in the state adult education program. These forms measure EFLs in three subjects: math, reading, and language. TABE consists of five test levels (literacy, easy, medium, difficult, and advanced), two test forms (11 & 12), and a locator test.

In rare instances a student may not need to be assessed in all areas; however, programs should decide the skill areas most relevant to each student's needs or the program's curriculum and assess the student in these areas. Adult education programs will document the rationale for doing so in the student file and WorkOne/AJC office staff will document the rationale in the DWD case management system.

- **WorkOne/AJC.** For valid reporting of EFLs, eligible test candidates should complete the entire test suite (reading, language, and math) as a pre-test. Testing should be completed within eight (8) consecutive calendar days.
- **Adult Education.** Eligible adult education students should complete the entire test suite (reading, language, and math) as a pre-test. Testing should be completed within eight (8)

consecutive calendar days. Students who have not attended adult education classes for more than ninety (90) consecutive calendar days should be administered a new pre-test.

- **Youth.** Title I eligible youth requirements mandate that programs serving WIOA Title I eligible youth should administer TABE beginning with the locator test if TABE is used to determine basic skills deficiency.

**TABE Complete Language Assessment System - English (TABE CLAS-E, Forms A & B)** is approved for all non-English speakers and individuals with limited English proficiency in the state adult education program.

- TABE CLAS-E measures the language proficiency of adult ELL students in the areas of reading, listening, writing, and speaking. Adult education programs will assess ELL students in *at least one* or more of the following subjects: reading, writing, or listening. Programs may choose to assess students in speaking; however, gains made in this subject will not count as gains for NRS or Indiana’s performance metrics.

**ACT WorkKeys Applied Math forms 014, 015, 016, and 017** are approved for all learners in the state adult education program.

**ACT WorkKeys Workplace Documents Assessment forms 018, 019, 020, and 021** are approved for all learners in the state adult education program in Literacy/English Language Arts at ABE levels 2-6.

### ***General Assessment Requirements***

Whether adult education students take either TABE, TABE CLAS-E, or ACT WorkKeys assessments, one of the assessments should be administered to the students by the time of official enrollment, defined by NRS as twelve (12) hours of attendance.

**NOTE: Before administering TABE, providers should administer the locator test to determine which level of TABE is appropriate. The “locator test” only applies to TABE.**

- **WorkOne/AJC.** The TABE test suite (reading, language, and math), TABE CLAS-E, or ACT WorkKeys should be completed within eight (8) consecutive calendar days. Individuals who have not made contact for more than ninety (90) consecutive calendar days should be administered a new pre-test; otherwise, with regular contact, the TABE, TABE CLAS-E, or ACT WorkKeys pre-test results can be used by WorkOne/AJC office staff for six (6) months to gauge readiness for training.
- **Adult Education.** The TABE test suite (reading, language, and math), TABE CLAS-E, or ACT WorkKeys should be completed within eight (8) consecutive calendar days. Students who have not attended adult education classes for more than ninety (90) consecutive calendar days should be administered a new pre-test.
- **Youth.** Title I eligible youth requirements mandate that programs serving WIOA Title I eligible youth should administer ACT WorkKeys, TABE CLAS-E, or TABE beginning with the locator test unless other methods are used to determine basic skills deficiency.<sup>1</sup>

---

<sup>1</sup> The “locator test” only applies to TABE.

## ***Guidelines for Administering the Assessment***

TABE, TABE CLAS-E, and ACT WorkKeys should be taken online or, as a last resort, in paper-and-pencil format. **NOTE: TABE Level L is only available as paper based.** Local programs may implement virtual test proctoring using the assessments identified in this policy, in accordance with the test publisher's procedures for virtual testing. Prior to administering TABE, as noted in the General Assessment Requirements section above, providers should administer the locator test to determine which level of the assessment is appropriate.

If multiple skill areas are assessed and the student has different abilities in different areas, the program should place the student according to the lowest functioning level. For example, if a student is at the beginning level in reading and the low intermediate level in numeracy, then the student would be placed in the beginning level.

Adult education providers will measure and report measurable skill gains (raw scores) based on educational functioning levels into InTERS (the DWD Adult Education database). WorkOne/AJC office staff, working as partners with adult education, will measure and report EFLs in DWD's case management system.

**TABE, TABE CLAS-E, and ACT WorkKeys** – Adult education providers will enter all required data<sup>2</sup> points in InTERS, and WorkOne/AJC office staff will enter all required data points in DWD's case management system after the student completes each test.

### **InTERS – Data Entry Requirements**

DWD strongly recommends that data be entered into InTERS on a weekly basis at a minimum. Timely data entry will allow program staff and DWD to analyze data on a regular basis and use it for program planning and continuous program improvement. However, DWD requires that all monthly data be entered by the **10th of the consecutive** month and data should be available for review.

DWD monitors<sup>3</sup> Adult Education programs across the state and maintains the InTERS system. Responsibilities include providing technical support; monitoring data at least quarterly (more frequent if warranted); monitoring program data entry errors monthly or when notified by an adult education program; working with programs to fix data entry errors; and producing and submitting NRS tables to the federal government. Adult Education coordinators also utilize InTERS to monitor the performance of all programs within their region(s).

While data checks and error reports are built into InTERS, local programs should make every effort to ensure accurate data by identifying errors and missing data soon after entry. DWD encourages programs to monitor student progress and attendance through InTERS daily. Furthermore, program data entry personnel will work with DWD on data entry errors/issues, and at least two staff members should always be trained and have access to the system.

Job descriptions should include staff roles and responsibilities for data collection, and ongoing training is provided. If DWD determines that a program has a pattern of data entry discrepancies beyond

---

<sup>2</sup> See DWD's *Adult Education Data Collection and Reporting* policy for additional guidance.

<sup>3</sup> See DWD's *Adult Education Program Monitoring and Improvement Policy* for additional guidance.

occasional errors, the program will be monitored and may be required to submit additional documentation.

The table below lists the **approximate** alignment between TABE scale scores and NRS EFLs. This alignment is not identical across all TABE tests levels (TABE L-A) or forms (11 and 12).

**TABE 11 and TABE 12 Scale Score Conversions to NRS Levels<sup>4</sup>**

NRS EFL Level	Reading	Math	Language
1. ABE Beginning Literacy	300-441	300-448	300-457
2. ABE Beginning Basic	442-500	449-495	458-510
3. ABE Intermediate Low	501-535	496-536	511-546
4. ABE Intermediate High	536-575	537-595	547-583
5. ASE Low	576-616	596-656	584-630
6. ASE High	617-800	657-800	631-800

Scores falling outside of the valid ranges (invalid scores) may not be reliable. In the case of invalid scores, retesting with a more appropriate level is required within thirty (30) calendar days from the original test date. Students only need to be retested in the subject(s) for which they received an invalid score.

Similarly, the table below lists the **approximate** alignment between TABE CLAS-E scale scores and NRS EFLs. This alignment is not identical across all TABE CLAS-E tests levels (1-4) or forms (A and B). The table also lists which TABE CLAS-E test levels can be used to measure attainment of each NRS EFL. For example, the Level 1 test can only measure attainment of NRS EFLs 1-3. To measure attainment of NRS EFLs 4 or higher, the student should take a higher TABE CLAS-E test level.

**TABE CLAS-E Reading Scale Score Conversions to NRS Levels<sup>5</sup>**

NRS ELL Level	Test Levels	Reading	Writing	Total Reading & Writing	Listening
1	1, 2, 3, 4	250-392	200-396	225-394	230-389
2	1, 2, 3, 4	393-436	397-445	395-441	390-437
3	1, 2, 3, 4	437-476	446-488	442-482	438-468
4	2, 3, or 4	477-508	489-520	483-514	469-514
5	3 or 4	509-557	521-555	515-556	515-549
6*	4 only	558-588	556-612	557-600	550-607

\*If a student is at this level, transition them to ABE and administer TABE 11 and TABE 12.

### ACT WorkKeys Applied Math

The Applied Math assessment measures critical thinking, mathematical reasoning, and problem-solving techniques for situations that occur in today's workplace. There are five levels of difficulty. Level 3 is the least complex, and Level 7 is the most complex. The levels build on each other, each incorporating the skills assessed at the previous levels. For example, at Level 5, individuals need the skills from Levels 3, 4, and 5.

<sup>4</sup> <https://nrsweb.org/training-ta/ta-tools/assessment>.

<sup>5</sup> <https://nrsweb.org/training-ta/ta-tools/assessment>.

### ACT WorkKeys Workplace Documents

The Workplace Documents assessment measures skills that individuals use when they read real workplace documents and use that information to make job-related decisions and solve problems. There are five levels of difficulty. Level 3 is the least complex, and Level 7 is the most complex. The levels build on each other, each incorporating the skills assessed at the previous levels. For example, at Level 5, individuals need the skills from Levels 3, 4, and 5.

The table below provides WorkKeys assessment scale scores (benchmarks) for each NRS EFL.

#### ***NRS Educational Functioning Level Benchmarks<sup>6</sup>***

<b>Education Functioning Levels</b>	<b>WorkKeys Workplace Documents Scale Scores on Workplace Document Forms 018, 019, 020, and 021</b>	<b>WorkKeys Applied Math Scale Scores on Applied Math Forms 014, 015, 016, and 017</b>
Level 1: Beginning ABE Literacy	N/A	71-73
Level 2: Beginning Basic Education	73-74	74-78
Level 3: Low Intermediate Basic Education	75-77	79-82
Level 4: High Intermediate Basic Education	78-80	83-85
Level 5: Low Adult Secondary Education	81-82	86-87
Level 6: High Adult Secondary Education	83-90	88-90

Adult education programs should continually post-test the student to determine educational gains after a required number of attendance hours, or after a student has demonstrated enough progress to merit a post-test. TABE guidelines recommend a set number of attendance hours in adult education between the administration of TABE pre- and post-tests. These hours, summarized in the table below, vary based on NRS level and the form of the administered test (same or alternate).

DWD has set a goal of 70 percent of students to be post-tested.

Post-tests should be issued each time a student reaches the required number of attendance hours. Students will post-test in the same subject areas (pre-test scores less than 12.9) as initially assessed. In the event of an invalid score, providers have thirty (30) calendar days from the original test date to retest the student and record the score.

The table below provides the recommended attendance hours between the pre- and post-tests for TABE forms 11 and 12.

<sup>6</sup> <https://www.act.org/content/act/en/products-and-services/act-workkeys/act-workkeys-assessments/nrs-approval.html>.

**Recommended Attendance Hours between Pre- and Post-Test**

Test	NRS Levels	Same Test Form or Alternate Test Form for Post-test	Recommended Attendance Hours
TABE 11 & 12	ABE EFLs (Levels 1-4)	Alternate Example: Pre-test 11M, Post-test 12M	50 - 60 (Minimum 40 hours)
TABE 11 & 12	ASE EFL (Level 5/6)	Alternate	30 - 59
TABE 11 & 12	ABE & ASE EFLs (Levels 1-5)	Same Example: Pre-test 11M, Post-test 11M	60-80

Hours toward a post-test begin counting after the student completes the pre-test and end the day the student completes the post-test. These include all adult education attendance hours, including distance learning, which may include orientation, instruction, and the time a student spends on the post-test.

Post-tests may be administered sooner than the recommended hours of attendance **only** if a student receives intense instruction or plans to exit the program. Documentation of early test administration will be maintained in InTERS. The instructor may consider administering the next level of TABE if the student shows the potential to score higher than the valid score range if given the same level test that was given as a pre-test. For example, if the student was administered the TABE 11M pre-test, the instructor could administer the student the TABE 11D post-test if the student shows significant skill progress.

ACT WorkKeys must follow the same number of attendance hours as TABE between administration of pre- and post-tests.

**Proctor Training Requirements**

Local adult education providers and WorkOne/AJC staff who administer or score assessments are responsible for participating in assessment training at least annually and must follow all DWD issued guidance. New adult education or WorkOne/AJC staff should review all training materials available on DWD's website as well as attend locally provided training prior to administering any educational functioning level assessments.

Regionally designated training staff will be responsible for providing ongoing training for new staff and refreshing the skills of previously trained staff at a local level. Training will include NRS policy, accountability policies, data collection processes, definitions of measures, how to conduct the assessments, and discussion on best practices. Staff who attend these trainings must record who has attended, the trainer(s), and the date of the training at a local level. The attendance records must be available to DWD staff when requested to ensure training is being conducted and attended per policy.

**Accommodations**

Fulfilling learner requests for reasonable accommodations, at no cost to individuals, is the responsibility of the provider delivering the assessment. To determine if an individual is eligible for accommodations, follow the test publisher's guidance. Individual students with disabilities are responsible for providing information and documentation for their disability. Provider staff should review documentation, consider needed accommodations, offer counseling to the student, and establish accommodations,

when eligible. Accommodations include extended time, no time limits, pausing, and other reasonable accommodations suggested by a medical professional.

The Rehabilitation Act of 1973 Section 504, the Individuals with Disabilities Education Act of 1997, and the Americans with Disabilities Act of 1990 have provisions related to reasonable testing accommodations for learners with disabilities.

## **Action**

Staff using TABE, TABE CLAS-E, and/or ACT WorkKeys to assess educational functioning levels shall follow the contents of this policy. Local areas must update local policies to align with this guidance.

## **Attachments**

**Attachment A** – References

## **Effective Date**

Immediately.

## **Ending Date**

Upon rescission.

## **Additional Information**

Questions regarding the content of this publication should be directed to [policy@dwd.in.gov](mailto:policy@dwd.in.gov).



## Attachment A References

- Workforce Innovation and Opportunity Act, Section 203
- 34 CFR 462.1-462.4, 462.10-462.14, and 462.40-462.44
- Office of Management and Budget (OMB) Number 1830-0027, *Measures and Methods for the National Reporting System for Adult Education*<sup>7</sup>
- National Reporting System for Adult Education, Assessment<sup>8</sup>
- Section 504 of the Rehabilitation Act of 1973<sup>9</sup>
- General Provisions of the Individuals with Disabilities Education Act of 1997<sup>10</sup>
- Americans with Disabilities Act of 1990, As Amended<sup>11</sup>
- ACT, *ACT WorkKeys Assessments Approved by National Reporting System*<sup>12</sup>
- 2017-15 *Adult Education Data Collection and Reporting*
- DWD Policy 2015-11, Change 1 *Adult Education (AE) Professional Qualifications and Development Policy*
- 2014-04 *Adult Education Program Monitoring and Improvement Policy*

---

<sup>7</sup> [Measures and Methods for the National Reporting System for Adult Education - OMB 1830-0027.](#)

<sup>8</sup> <https://nrsweb.org/training-ta/ta-tools/assessment>.

<sup>9</sup> [Section 504, Rehabilitation Act of 1973 | U.S. Department of Labor \(dol.gov\).](#)

<sup>10</sup> [Subchapter I - Individuals with Disabilities Education Act.](#)

<sup>11</sup> [Americans with Disabilities Act of 1990, As Amended | ADA.gov.](#)

<sup>12</sup> <https://www.act.org/content/act/en/products-and-services/act-workkeys/act-workkeys-assessments/nrs-approval.html>.