1 **TEXAS WORKFORCE COMMISSION**
2 **Adult Education and Literacy Letter**

ID/No:	AEL 03-20
Date:	July 7, 2020
Keyword:	AEL; Natural Disaster; WIOA
Effective:	Immediately

3 **To:**   Adult Education and Literacy Grant Recipients
4   Adult Education and Literacy Special Project Grantees
5   Local Workforce Development Board Executive Directors
6   Commission Executive Offices
7   Integrated Service Area Managers

8 *Courtney Arbour*

9 **From:**   Courtney Arbour, Director, Workforce Development Division
10 **Subject:** Remote Testing and Performance in Adult Education and Literacy

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12 **PURPOSE:**
13   The purpose of this AEL Letter is to provide Adult Education and Literacy (AEL)
14   grantees[1] with information and guidance on remote testing options during the global
15   COVID-19 pandemic (pandemic), including the remote administration and use of:

16   • National Reporting System (NRS)–approved tests allowed for federal AEL
17   performance accountability; and
18   • Non-NRS–approved tests that are approved for performance accountability, such as
19   the Texas Success Initiative Assessment (TSIA), GED Ready®, HiSET® Interactive
20   Practice Tests, and tests included in commercial learning software programs.

21 **RESCISSIONS:**
22   None

23 **BACKGROUND:**
24   Governor Greg Abbott declared Texas a disaster site on March 13, 2020, in response to
25   the pandemic. The declaration spurred the closure of most educational and workforce
26   development institutions across the state. AEL grantees and their providers responded by
27   transitioning service delivery from on-site locations to distance and remote delivery
28   platforms. This required a change to most aspects of service delivery, including education

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[1] For the purposes of this AEL Letter, AEL grantees are entities that receive AEL funds through the Texas Workforce Commission (TWC).

and training services and testing for performance accountability measures and follow-up services, all of which almost exclusively rely on on-site, in-person activity.

Performance Accountability

TWC and the US Department of Education[2] understand that performance results for many AEL performance measures will be impacted by pandemic-related service delivery disruptions, which immediately closed most educational and workforce physical facilities and ended on-site services, thus halting or slowing enrollments, and pausing all on-site performance testing on NRS-approved tests as well as high school equivalency testing center operations. TWC anticipates that the volume of AEL services among existing participants will continue to be impacted and altered as programs transition to remote and distance learning options and also understands that not all students have access to participate in remote instruction.

The immediate closures of on-site services directly impact the Workforce Innovation and Opportunity Act (WIOA) Measurable Skill Gains (MSGs) and credential attainment measures, which almost exclusively rely on on-site proctored testing. TWC also recognizes that there will be delayed data entry during the pandemic period; this delay may continue as a result of institutional closures and the accumulation of unentered data.

Although the pandemic has disrupted AEL services and participant access to these services, TWC anticipates demand for AEL services to increase as a result of rising unemployment in the state.

For agency performance accountability across all TWC programs, TWC is operating under the following general principles during this period:

- TWC recognizes that performance on many measures will likely be impacted by the pandemic.
- It is too early to know what the full impact of the COVID-19 pandemic will be.
- TWC will monitor the situation to determine the appropriate recommendations to agency leadership, the Texas Legislative Budget Board, and federal partners.
- Those recommendations will be informed by what the data shows.
- Grantees should not fail performance solely as a result of the pandemic.

The immediate service delivery disruptions caused by the onset of the pandemic in March 2020 will result in disruptions as institutions begin to reopen for on-site services and after Texas communities begin to transition out of social distancing measures.

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[2] US Department of Education Program Memorandum OCTAE 20-3 regarding Adult Education and Family Literacy Act and COVID-19—Frequently Asked Questions, published on March 27, 2020, describes initial allowances made to states due to the pandemic.
https://www2.ed.gov/about/offices/list/ovae/pi/AdultEd/octae-program-memo-20-3.pdf

Remote Testing

Testing is a major function of AEL services. Remote testing will provide AEL grantees with an option to determine both the skill needs and placement of students, as well as support performance reporting under the NRS.

The US Department of Education's Office of Career, Technical, and Adult Education (OCTAE) released Program Memoranda OCTAE 20-3, 20-4, and 20-5, which provide guidance on service continuity to the Adult Education and Family Literacy Act program during the pandemic, including clarifications on performance accountability and remote testing under the NRS. This guidance provides the federal basis for this AEL Letter.

Remote testing requires changes to most aspects of test delivery and an increased need for test security and protection of personally identifiable information (PII). Although remote testing provides access for grantees to report performance, considerable delays and constraints are initially expected as test publishers release guidance, providers develop standard operating procedures (SOPs), certified test proctors are trained on remote testing procedures, and technological equipment and related supplies necessary for testing compliance are purchased and put in place. Even though remote testing will become available, some AEL participants will not have access to or be comfortable with remote testing and thus will not be able to test until on-site testing resumes.

As test publishers issue guidance on remote testing and local providers find innovative ways to implement such policies, TWC anticipates remote testing guidance to evolve over the coming months.

PROCEDURES:

No Local Flexibility (NLF): This rating indicates that AEL entities must comply with the federal and state laws, rules, policies, and required procedures set forth in this AEL Letter and have no local flexibility in determining whether and/or how to comply. All information with an NLF rating is indicated by "must" or "shall."

Local Flexibility (LF): This rating indicates that AEL entities have local flexibility in determining whether and/or how to implement guidance or recommended practices set forth in this AEL Letter. All information with an LF rating is indicated by "may" or "recommend."

NLF: AEL grantees must be aware of the following definitions:

New Student Served at a Distance (new student) is an individual who accesses AEL services remotely and is unable to complete an NRS-approved test. Providers serving new students remotely must do the following for those students:

- Complete the enrollment form, including the required Participant Individual Record Layout (PIRL) elements
- Complete a release-of-information form
- Enter into the Texas Educating Adults Management System (TEAMS) a participant record and profile

- Enter student into the Pandemic Affected Staff-Determined Eligible Students (PASES) Tracker once placed into class

Providers may deliver a non-NRS–approved test for staff-determined eligibility, class placement, and instructional support.

Non-NRS Approved Test is a test that is not approved for performance accountability under the NRS, such as, but not limited to, the Test of Adult Basic Education (TABE) Placement Locator, TSIA, GED Ready®, HiSET® Interactive Practice Tests, and tests included in commercial learning software programs. Grantees and providers may administer these tests to individuals enrolling in the AEL program during the pandemic period as part of staff-determined eligibility, class placement, and instructional support.

NRS-Approved Test is a test that is approved for AEL performance accountability purposes in Texas, as outlined in the [Texas AEL Assessment Guide](#). Current tests allowed for use in the Texas AEL program are the BEST Plus 2.0, BEST Literacy, TABE® 11&12, TABE CLAS-E, CASAS Reading GOALS, CASAS Math Goals, and the CASAS Life & Work Listening and Reading series.

On-Site Testing is testing that is administered at a physical location, where the test administrator and the test taker are together, and the test administrator can observe the testing process in person in a formal testing environment.

Pandemic-Affected Staff-Determined Eligible Students (PASES) Tracker is the Microsoft Excel reporting tool that providers use to track students who enter the AEL program remotely and do not have a usable NRS-approved pretest.

Remote Testing, also referred to as virtual testing, is testing in which the test administrator is in a separate location from the test taker. This separation means that the test administrator cannot observe the testing process in person and that the test taker may not be in a formal testing environment.

Staff-Determined Eligibility is eligibility that is not determined using a placement score on an NRS-approved test, but staff is still required to determine whether the individual requesting services:

- is basic skills deficient;
- lacks a secondary school diploma or its recognized equivalent and has not achieved an equivalent level of education; or
- is an English language learner, defined as someone who:
  - has limited ability in reading, writing, speaking, or comprehending the English language; and
    - whose native language is a language other than English; or
    - who lives in a family or community environment where a language other than English is the dominant language.

Additional guidance on staff-determined eligibility can be found at
https://tcall.tamu.edu/docs/ServingNewStudentsAtADistance.pdf.

Performance Accountability

NLF: **Service First:** AEL grantees must focus efforts on delivering educational and workforce services to current or returning participants and new students as a first priority over performance accountability concerns during the pandemic period and as Texas communities transition out of social distancing measures.

NLF: **Hold Harmless:** AEL grantees must be aware that a grantee will not fail performance solely as a result of the impacts of the pandemic. TWC staff is aware that grantee performance will be negatively affected due to enrollment, testing, and other performance accountability constraints and inconsistencies.

LF: **Staff-Determined Eligibility:** AEL grantees may use a staff-determined eligibility process to determine whether an individual is eligible for Adult Education and Family Literacy Act services. Once eligibility is established, the grantee may enroll an individual as a participant once he or she has accumulated 12 contact hours. All participants must be reported under AEL performance accountability, regardless of whether an NRS-approved pretest is administered.

NLF: **Non-NRS–Approved Tests:** AEL grantees must be aware that providers may administer non-NRS–approved tests to individuals enrolling in the AEL program during the pandemic period as part of staff-determined eligibility, class placement, and instructional support. Non-NRS–approved tests cannot be used toward AEL performance measures.

NLF: **Placement:** AEL grantees must be aware that they may use other assessment methods to provisionally assign an educational functioning level (EFL) for the purpose of placing students into a provisional NRS educational functioning level when an NRS-approved test cannot be administered. Local programs must adjust the initial provisionally assigned EFL placement based on the pretest score once an NRS-approved pretest is administered.

NLF: **Reasonable Attempt:** AEL grantees must make every reasonable attempt to resume NRS-approved testing as test publishers release remote testing guidelines or Texas communities begin to transition out of stay-at-home restrictions and on-site testing resumes. Using a staff-determined eligibility process, AEL grantees should administer an NRS-approved pretest in accordance with the AEL assessment policy as soon as feasible for all students enrolled. TWC recognizes that remote testing or on-site testing implemented with social distancing protections may initially be difficult for providers to accomplish for current participants and new students due to the following constraints:

- There will be staggered availability of each of the NRS-approved tests for use in Texas into the summer of 2020 as test publishers roll out remote testing guidance and capabilities.
- There will be a backlog of individuals needing tests, including new students and current participants who need a posttest. The predicted inability or limitation

established by the publisher to administer tests in small remote group settings will slow providers' ability to reduce the backlog.

- Local test proctoring may face constraints as trained test proctors split their workload across testing, instruction, and other administrative work.
- Student test takers may:
  - lack access to or lack an adequate computer, tablet, or similar items and necessary software at-home and/or broadband access to meet test-publisher remote testing requirements;
  - lack the confidence and comfort of working in an online environment and engaging remotely to take online tests;
  - be unable to dedicate the uninterrupted time and isolation at home required to complete remote testing;
  - not have access to a private in-home location needed for testing; and
  - have other constraints that prevent testers from taking tests remotely.
- The availability of on-site locations for testing may be very limited, and, therefore, on-site testing with social distancing measures may be extremely limited for test takers.

As a result of these constraints, AEL providers may not be able to administer to all individuals an NRS-approved test during the pandemic period.

Remote Testing on NRS-Approved Tests

NLF: **Test Publisher's Guidelines:** AEL grantees must follow NRS-approved test publisher's guidelines on remote testing, which can be found on the test publisher's website. TWC has created a [Remote Testing Guidance Chart](#) to summarize test publisher guidance.

NLF: **AEL Assessment Guide:** AEL grantees must be aware that guidance found in this AEL Letter is a provisional augmentation of guidance found in the Program Year 2019 (PY'19) and PY'20 AEL Assessment Guides. Grantees, if monitored in the future, may be monitored on testing guidance and documentation requirements in this AEL Letter and other AEL guidance provided during the pandemic period. TWC will update the PY'20 AEL Assessment Guide to include provisions for remote testing that will be based on the guidance in this AEL Letter and guidance provided during the pandemic period and over the next year.

NLF: **Prioritization:** As NRS-approved tests become available remotely, AEL grantees must prioritize students with expired tests and new students without a test in TEAMS.

NLF: **Changing Test Brands:** AEL grantees must be aware that some test publisher's guidance will become available sooner than others, resulting in some providers getting an early start on addressing their testing backlog.

LF: AEL grantees may change their adopted NRS-approved test due to another NRS-approved test becoming available earlier for remote proctoring.

NLF: **Using Other MSGs:** AEL grantees must be aware that other methods are available for participants to earn a basic education MSG other than the achievement of a pretest-

posttest MSG (Type 1a) as outlined in [AEL Letter 01-18, Change 1, Educational Outcomes for Adult Education and Literacy—*Update*](). These include the following:

- Postsecondary Enrollment MSG (Type 1b)
- HSE Achievement MSG (Type 2)

Only NRS-approved tests may be used to measure performance under the pretest-posttest MSG; thus, a participant with a provisionally assigned EFL must have his or her placement EFL confirmed or adjusted based on an NRS-approved pretest score. However, a participant with a provisionally assigned EFL may earn a postsecondary enrollment or HSE achievement MSG without a test on an NRS-approved test.

Additionally, while the US Department of Education does not recognize these MSGs for federal MSG performance, grantees may use the following MSG options to measure Workforce Training for Integrated Education and Training (IET) participants only. These may or may not be available through non-testing options.

- Postsecondary Transcript or Report Card in IET MSG (Type 3)
- Progress Milestone in IET MSG (Type 4)
- Skills Progression in IET MSG (Type 5)

Remote Testing Implementation

NLF: **Individuals Ages 16–17:** AEL grantees must be aware of privacy restrictions for 16- and 17-year-old test takers, which may restrict remote testing methods that use a camera or video to verify identity or to monitor testing. Grantees must obtain parental consent for testing that uses a camera or video image for students of this age.

LF: **Practice:** AEL grantees may build practice sessions with test takers to allow individuals to become familiar with remote testing processes. Practice sessions may be delivered in groups since no official testing occurs during practice.

NLF: **Procedures:** AEL grantees must implement remote testing following procedures that align with the test publisher's guidelines, including the following:

- **Pre-Screening and Test Orientation:** The provider has a pre-screening and test orientation procedure to do the following:
  a. Ensure that the test taker has access to an adequate computer, tablet, or similar items and necessary software at home and/or broadband access to meet test-publisher remote testing requirements.
  b. Provide advance planning with test takers to respond to audio, video, or other technical problems as well as control for unexpected disruptions.
  c. Verify the identity of the test taker.
  d. Orient the test taker to the remote testing process and expectations. If applicable, also allow time for individuals to practice using equipment in accordance with the test requirements and answer practice test questions with the proctor before entering the testing room session.

e. Explain to the test taker what steps are necessary to ensure a secure testing environment and that the remote testing process should not be interrupted or otherwise jeopardized.

- **Test Security:** The testing environment is properly secured.
- **Proctor Compliance:** The remote testing proctor meets the proctor qualifications and professional development requirements to properly administer the test.
- **Administration Compliance:** The proctor follows the unique remote testing requirements as specified by the test publisher.
- **Retesting:** The program has a procedure for retesting if remote administration of the test is interrupted or otherwise jeopardized.

LF: **Alternate Testing Locations:** As Texas communities transition out of stay-at-home restrictions and on-site testing resumes, AEL grantees should identify alternate testing locations if local independent school districts, community colleges, or other entities are closed during the summer or fall of 2020 or testing at those locations is prioritized to other populations. Alternate testing locations may also be necessary for similar reasons when high school equivalency testing becomes available.

LF: **Remote Testing Schedule:** AEL grantees have the option to schedule NRS-approved remote testing at times that best meet the needs of students. Tests may be scheduled one-on-one or in small group settings in accordance with the test publisher's guidelines. Grantees may consider nontraditional testing times to accommodate individuals who have limited access to a computing device during traditional hours.

NLF: **Locators and Tests Gaps:** AEL grantees must include in their SOPs the maximum planned time between when a student takes a locator test and when the full test is administered for tests that use a locator. The time should be based on the test publisher's guidelines, when available.

LF: **Un-Proctored Testing:** AEL grantees may conduct un-proctored tests on non-NRS–approved tests, such as the TABE Locator, the GED® Ready, and tests included in commercial learning software programs. Proctoring is required for all NRS-approved tests.

Standard Operating Procedures

NLF: AEL grantees must develop an SOP for remote testing. The SOP must be developed and distributed to providers and test administrators before remote testing can begin. The procedures must include the procedures and controls outlined in this AEL Letter as well as guidance found on the test publisher's website and the [Remote Testing Guidance Chart](#).

Reporting

NLF: **Entering Test Scores into TEAMS:** AEL grantees must enter all test scores for NRS-approved tests into TEAMS by the data entry deadline, which is the 15th day of the following month.

NLF: **New Students into TEAMS with NRS-Approved Tests:** AEL grantees must enter class contact time into TEAMS for a new student once he or she is tested on an appropriate NRS-approved test. Contact time that was previously tracked in the PASES tracker for the individual may not be entered retroactively into TEAMS.

NLF: **New Students into TEAMS with non-NRS–Approved Tests:** AEL grantees must be aware that future TEAMS modifications will allow students without an NRS-approved test to be entered into TEAMS with class contact time and a provisional EFL; when TEAMS enhancements allow for this, grantees will be required to enter all class contact time for any student receiving AEL services.

INQUIRIES:

Send inquiries regarding this AEL Letter to AELTA@twc.state.tx.us.

REFERENCES:

PROGRAM MEMORANDUM OCTAE 20-3, issued March 27, 2020, and titled "Adult Education and Family Literacy Act and COVID-19—Frequently Asked Questions"

PROGRAM MEMORANDUM OCTAE 20-4, issued April 17, 2020, and titled "Adult Education and Family Literacy Act and COVID-19—Frequently Asked Questions, Part 2"

AEL Letter 01-18, Change 1, issued September 7, 2018, and titled "Educational Outcomes for Adult Education and Literacy—*Update*," https://twc.texas.gov/files/policy_letters/ael01-18ch1.pdf