



Workforce Innovation and Opportunity Act Program

Universal Access and Assessment Services

POLICY/PROCEDURES

Policy Number: WIOA-09-2016-1

 New Policy

 X Policy Revision

Date: **January 23, 2018**

Subject: **Procedures for Administering Written Assessment Tests**

A handwritten signature in black ink, appearing to read "Michele Burns". The signature is written in a cursive style and is positioned above a horizontal line.

Michele Burns
Executive Director
CareerSource Okaloosa Walton

Date: 1/23/2018

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**Workforce Innovation and Opportunity Act (WIOA)
Universal Access and Assessment Services**

OF INTEREST TO:

All CareerSource Okaloosa Walton (CSOW) staff that administer written assessment services at the CareerSource centers.

SUBJECT:

Procedures for Administering Written Assessment Tests

PURPOSE:

To ensure assessments are conducted in a consistent and fair manner; and to ensure the outcomes yield reliable and valid test results for the test takers, employers, and other users of the assessment data.

REFERENCE

1. 29 CFR Part 38; Implementation of the Nondiscrimination and Equal Opportunity Provisions of the Workforce Innovation and Opportunity Act. December 2, 2016; (Nondiscrimination by recipients of federal financial assistance under WIOA).
2. Promising Practices in Achieving Universal Access and Equal Opportunity: A Section 188 Disability Reference Guide, July 9, 2015.
3. WIA Section 188 Disability Checklist (July 22, 2003) available at <http://www.dol.gov/oasam/programs/crc/WIASection188DisabilityChecklist.htm>.
4. Training and Employment Notice (TEN) 1-15, July 6, 2015.

Supersedes/Revision:

**Procedures for Administering Written
Assessment Tests**

Date: September 8, 2016

BACKGROUND

Providing career services and training services that meet the needs of job seekers form the backbone of the CSOW one-stop delivery system. While some job seekers may only need self-services or other basic career services like job search assistance, labor market information, labor exchange services or information about other services in the community, others will need services that are more comprehensive and tailored to their individual career needs. Before engagement in these services a comprehensive assessment may be required.

Assessments also serve as a screening tool and are critical for employers to identify individuals with the right skills for the purposes of pre-employment selection.

It is the intent of CareerSource Okaloosa Walton to increase the **delivery of career services and screening tools to diverse populations and assist them in finding employment and training in a career that best fits their employment goals.** These populations may include low-income individuals, individuals underrepresented in targeted industries, dislocated workers, individuals with disabilities, and other populations with training and employment barriers, who are most in need of these services; it also includes employers who are in need of finding talented individuals who can prove they can do the job.

Standardized assessment instruments are a necessary part of the CSOW assessment process. The guidelines discussed in this local operating procedure are designed to strengthen the assessment process; and introduce staff to new protocols to use when administering assessments. Furthermore, ensuring an appropriate testing environment is also an important component of the design. All of these elements are necessary to ensure that assessment services delivered through the one-stop system are conducted in a manner that ensures fairness to test takers, and yields reliable and valid test results for customers or employers.

A. KEY CONCEPTS

1. **Individual with a Disability:** For the purposes of this local operating procedure the term "**individual with a disability**" is defined in the current Section 188 regulations as an individual with "**a physical or mental impairment that substantially limits one or more of the major life activities of such individual; a record of such an impairment; or being regarded as having such an impairment.**"
2. **Reasonable Accommodations:** CareerSource staff are required to provide reasonable accommodation for individuals with disabilities to ensure equal access and opportunity. The term "**reasonable accommodation**" is defined in Section 188 regulations as "**[m]odifications or adjustments to an application/registration process that enables a qualified applicant/registrant with a disability to be considered for the aid, benefits, services, training or employment that the qualified applicant/registrant desires;**" or "**[m]odifications or adjustments that enable a qualified individual with a disability to perform the essential functions of a job, or receive aid, benefits, services, or training equal to that provided to qualified individuals without disabilities;**" or "**[m]odifications or adjustments that enable a qualified individual with a disability to enjoy the same benefits and privileges of the aid, benefits,**

services, training, or employment as are enjoyed by other similarly situated qualified individuals without disabilities.”

3. **Disclosure of Disability:** During Career Center Orientations or in one-on-one sessions, CareerSource staff should inform individuals that, if they have a disability, they may disclose their disability and request and receive a reasonable accommodation, reasonable modification, and/or auxiliary aids and services. In addition, it should be made clear that disclosure is voluntary and information regarding disability will be kept confidential and maintained in a separate file.
 - a. Staff working with individuals with disabilities must obtain permission from the individual before disclosing information about his or her disability with others.
 - b. All discussions between staff and customers are conducted in a manner that ensures the preservation of confidentiality.
4. According to TEGL 17-05, Common Measures, when administering assessment tools, individuals with disabilities (as defined in 29 CFR Part 37.4) should be accommodated according to:
 - a. Section 188 of the WIOA (implementing regulations at 29 CFR Part 38), Section 504 of the Rehabilitation Act of 1973 (DOL implementing regulations at 29 CFR Part 32), and Title II of the Americans with Disabilities Act, if applicable (implementing regulations at 28 CFR Part 35) taking into consideration;
 - b. Guidelines associated with the assessment test; and
 - c. State law or policies.
5. According to TEGL 17-05, in the assessment context, accommodations are changes that are made to the materials or procedures used for the assessment in order to "level the playing field" to ensure that the assessment tool measures the individual's skills and abilities, and not his or her disabilities.
6. Accommodations for the assessment process generally fall into the following categories:
 - a. Changes to the methods of **Presentation** of the test used as an assessment tool: e.g., providing Braille versions of the test, or orally reading the directions or test questions to test-takers;
 - b. Changes to the methods of **Response** to the test questions: e.g., having the test-taker point to a response or use a computer for responding;
 - c. Changes to the **Setting** in which the test is provided: e.g., permitting the test to be taken at home, or in small groups, rather than in a large-group or institutional setting; (This must be requested and approved in writing by

the COO or Executive Director in advance); and

- d. Changes to the **Timing/Scheduling** of the test: e.g., extending the amount of time generally provided for completion of the test, permitting frequent breaks, etc.
7. This LOP does not apply to Objective Assessments (OA), Initial Assessments (IA), or other Program assessments or workforce employment plans such as, ISS, IRP, EDP, IEP, etc.

POLICY GUIDANCE

A. CSOW EMPLOYMENT AND TRAINING GUIDING PRINCIPLES

1. Seven Guiding Principles:

- a. Listen and Empathize with the customer.
- b. Focus on work attachment.
- c. Balance the short-term goal of moving participants into immediate employment and the long-term goal of moving households to self-sufficiency.
- d. Respond and adapt to the local economy.
- e. Maximize collaboration and expertise of local partners.
- f. Use measureable results to ensure program funds are used for efficient and effective components.
- g. Use communication skills that expand cooperation and respect for customers.

B. SERVING INDIVIDUALS WITH DISABILITIES

1. Just because a person does not use a wheelchair, wear hearing aids, or display other visible signs does not mean that he or she does not have a disability. Some disabilities such as learning disabilities may be invisible. Individuals with specific learning disabilities generally have average to above average intelligence, but may have difficulties demonstrating knowledge and understanding of some concepts.
 - a. There are many ways that disabilities can affect the ability to perform effectively on the job. Levels of ability are unique to an individual.
 - b. Most accommodations are simple. When working with individuals with disabilities, or someone you think may have a disability (Remember that a person does not

have to disclose they have a disability), specifically learning disabilities. Staff should use the following strategies to assist the individual(s).

- (1) Discuss confidentially with the person the best ways to communicate instructions. This may include written, verbal, or visual strategies; or, a combination of several types of communication. For example, a tape recorder may be useful for relaying instructions in some circumstances. The individual may have developed methods for compensating for the limitations caused by their disability. Discuss options with them.
 - (2) Once instructions are given, ask for feedback from the individual to try to determine if the goal to communicate was accomplished.
 - (3) Be patient with the individual. Assign single goals they can accomplish and build on their strengths.
 - (4) Avoid making a lot of changes in the schedule. Try to use a consistent routine.
 - (5) Reduce time pressures when possible.
 - (6) Allow extra time to complete assignments and let the person pace him or herself.
- c. Another option to consider for some customers: If the customer has a major barrier, staff should consider scheduling an in-person one-on-one orientation and/or assessment.
- d. CSOW staff should provide information about all of the CSOW programs to all customers so an individual customer does not have to disclose the fact that he or she has a disability in order to learn about these programs.
- e. The **COO** in coordination with the **Program Coordinators**, and **Disability Program Navigator** should develop a packet of information to be given to customers that describes disability disclosure rights, considerations, and obligations by CareerSource staff, including explaining when staff may ask medical or disability-related questions, how staff keeps that information confidential, explanations of why an individual may not want to disclose, and why disclosure may be beneficial (e.g., entitlement to reasonable accommodations/modifications or auxiliary aids and services).

C. ASSESSMENTS AND SCREENINGS

1. During the initial intake process, if it comes to the attention of CSOW staff that an individual may have a functional impairment that could impact his or her ability to benefit

from services, the individual should be provided with an opportunity for a more comprehensive assessment conducted by qualified personnel to make a determination for the purposes of determining eligibility for other services and/or for identifying appropriate accommodations and modifications.

2. Where programs allow and appropriate, CSOW staff may use data that was previously collected about a particular customer, rather than asking customers repeatedly for the same information.
3. Staff members should be knowledgeable about:
 - a. The information that must be given to a customer before asking questions that may lead to disclosure of information about disability, and about the process of obtaining customers' informed consent before referring them for diagnostic assessment or further assessment of strengths, skills, and abilities;
 - b. Which funds may be used for conducting a comprehensive assessment, such as Vocational Rehabilitation, TANF, and/or Medicaid funds? Staff should also be provided training about how to access these funds and coordinate the process of referral for diagnostic assessment. The **Disability Program Navigator** can assist with coordinating training.

D. ASSESSMENT TOOLS

1. The CSOW staff will use a variety of assessment tools to assist its customers. Over the years, CSOW has invested in several evidence-based assessment tools that can be used to assess participants' knowledge, skills, and abilities. These tools are used to identify the mix of interventions and services for these diverse customer groups. CSOW staff will continue to search for additional assessment tools that may provide improved methods of assessing the needs of its customers.
2. CSOW staff should ensure appropriate assessment tools are available for participants and universal customers to use. These tools are a necessary component of WIOA Career Services, Welfare Transition Program services, Re-employment Services Eligibility Assessment Program services, and other workforce program services. The outcome of such assessments often has direct influence on eligibility and suitability for programs and employment.
3. CSOW staff is instructed to determine the most appropriate assessment tool for each participant. Staff should give consideration to their strategy for assessment, discovery, and exploration of the individual's strengths and abilities. Several assessments/aptitude tools are available to ensure an appropriate occupational "fit" for employers; and to identify skills gaps for customers and program staff. Below is a list of the primary assessments tools they may be used by Career Center staff:
 - a. Kuder Journey – Provides **research-based** assessments to help participants find careers that match their interests, skills, and work values;

- b. Florida Ready to Work Certificate – Demonstrates to current and future employers that participants have the skills to meet employment expectations;
 - c. Prove It! - Skills and behavioral assessments for clerical, software, technical, call center, industrial, financial, legal, medical, etc.;
 - d. Academic Skills Testing: Test of Adult Basic Education (TABE).
4. Assessment procedures must include processes to identify customers with special needs and adjust testing procedures to meet those needs.
5. The CSOW staff will use assessment tools, tests, and other processes that measure the ability of the individual to successfully participate in a program rather than the person's physical, mental/cognitive, or sensory impairment. The CSOW staff must provide the legally required reasonable accommodations and reasonable modifications to the test or other protocols as necessary.
6. **Business Services** staff is responsible for development and implementation of a plan to market assessment services to both employers and job seekers. Marketing plans must include methods to inform the universal customer of assessment services that are available in the CareerSource Centers.

E. ADMINISTERING THE ASSESSMENT TEST

1. Tester must sign in at the Kiosk and Assessment Log for accountability purposes.
2. For pre-employment assessments, customer must bring/present the assessment invitation letter/email with information on the test titles and contact person to whom the test results should be sent.
3. Proof of identification should be presented by the tester at the time of check-in.
4. CSOW staff must [check EF to insure they are registered and active](#):
 - a. A proficiency test service code (130 Proficiency Test) along with a case note should be recorded in the customer's EF activity screen.
5. Set a session for and direct customer to the computer lab or testing area.
6. **Reports:**
 - a. For pre-employment assessments, detailed test reports must be emailed to the corresponding point of contact for selection decisions.
 - b. For individual accountability, tester can receive a copy of his or her test results

Important:

- (1) **Test Retakes:** Retaking the same type of test over and over again until testers accomplish the desired results is NOT allowed. This is an unfair practice that may defeat the purpose of a candidate proving his or her skill level for a given subject.
- (2) For pre-employment assessments, the employer must be made aware that all assessments are to be taken once for a given position/requisition number. Employers can authorize for a particular candidate to retake an assessment at their own discretion on a case-by-case basis. CSOW allows test retake after 6 months of the first attempt.
- (3) **Note:** Practice Retake Tests are only ALLOWED if the tester experiences technical difficulty with the computer or software for which they don't have control over the issue.
- (4) Assessment tests administered by CSOW staff are valid for six months, unless an employer requests a newer assessment on a customer.
- (5) A voluntary request by a customer to retake an assessment test to improve a score beyond the minimum acceptable standards may be granted if approved by the Business Services Program Coordinator for universal test or other appropriate Program Coordinator for program participants. In this case, only one retake per month may be allowed.
- (6) Every assessment shall be administered and monitored by a CSOW staff or a partner associate at an authorized facility. Tests MUST not be taken at home unless customer is pursuing to practice a given subject and the test is not related to applying or being considered for a given position.
- (7) **Tutorials** assessments are available and can be taken by customers at any point as many times as the customer request it.
- (8) CSOW staff should not teach assessment items to customers, change customers' answers, or in any manner provide answers to assessment questions for customers before, during, or after assessment administration.
- (9) CSOW staff will not use assessment items as an instruction tool or for customer practice either verbatim or in reworded form.
- (10) CSOW staff will not read assessment items orally to customers at any time before, during, or after the assessment administration unless it is an individual with a disability who needs accommodations, including needing English Language Learner (ELL) accommodations.
- (11) CSOW staff will not provide answers to assessment items, which include the provision of cues, clues, hints, and/or actual answers in any form.

- (12) CSOW staff will not change customers' responses to assessment items and/or influence or encourage customers to change their answers to assessment items at any time.
- (13) All assessment administration sessions shall be conducted according to the standardized procedures described in this LOP.
- (14) Failing to follow these rules for assessment administration may invalidate the assessment and assessment results.

F. CONFIDENTIALITY

All data collected as a result of this policy is for official use only, and should only be used in conducting official business. Refer to the Workforce Boards Policy on confidentiality for additional information.

G. SUGGESTIONS FOR CHANGES OR WAIVERS

1. Submit request for changes or waivers to this policy to CareerSource Okaloosa Walton, 109 8th Avenue, Shalimar, Florida 32579, ATTN: Executive Director or Chief Operating Office. Request may also be e-mailed to policy@careersourceow.com.
2. Request for **changes** must include the suggested change and an explanation of how the change will improve the process.
3. Request for **waivers** must include names, effective dates, case notes relating to the waiver, dollar amounts, etc.; and any other documentation to support the request.

H. ACTION REQUIRED

CareerSource Okaloosa Walton's Career Center staff will implement this policy upon receipt.