



WORKFORCE SOLUTIONS of the Coastal Bend

POLICY

CATEGORY:	Program Services	No: 4.0.102.01
TITLE:	Basic Skills Deficiencies	
SUPERSEDES:	4.0.102.00 dtd April 27, 2007	
EFFECTIVE:	June 29, 2012	
BOARD APPROVAL:	June 28, 2012	
DATE OF LAST REVIEW:	September 18, 2014	

I. PURPOSE:

To provide guidance on addressing Basic Skills Deficiencies, including Limited English Proficiency (LEP), English as a Second Language, (ESL), and math and literacy deficiencies.

II. DEFINITIONS:

Basic Skills Deficient - The individual computes or solves problems, reads, writes, or speaks English at or below the eighth grade level or is unable to compute or solve problems, read, write, or speak English at a level necessary to function on the job, in the individual's family, or in society

Basic Skills Goal – A measurable increase in basic education skills including reading comprehension, math computation, writing, speaking, listening, problem solving, reasoning, and the capacity to use these skills.

English As A Second Language (ESL) - A term used to describe customers whose primary language is other than English.

Limited English Proficiency (LEP) – A term used to describe customers with limited English language skills.

Literacy - The ability to read, write, and understand sentences and longer text. This includes the ability to read and understand written material presented in different ways, such as in a chart, sign, or newspaper article.

Post-test – A test administered to a participant at regular intervals during the program to show progress

Pre-test – A test used to assess a participant's basic literacy or math skills, which is administered to a participant up to six months prior to the date of participation or within 60 days following the date of participation.

III. POLICY STATEMENT:

LEP

Workforce Solutions of the Coastal Bend contracted service provider(s) shall ensure meaningful access by LEP customer to all critical services.

Reasonable steps must be implemented to ensure that LEP persons receive the full benefits offered by each Career center in the Coastal Bend region.

Assessments to determine the language (s) needs of the population within the delivery system will be coordinated by the contracted service provider(s). When the Career Center is reviewing the delivery systems, efforts shall be made to determine if any program system limits participation or denies participation to a significant proportion of the population it serves relative to language barriers.

Access to Services

Contracted Service Providers may use any of the following options and methods for providing meaningful access to Limited English Proficient beneficiaries:

- Identification and annual assessment of the language(s) needs of the affected population that are likely to be encountered;
- Estimating the number of Limited English Proficient persons that are eligible for services and that are likely to be affected by its program or activity
- Outreach to the Limited English Proficient (LEP) communities, advertising program eligibility and the availability of free language assistance;
- Posting of signs in the Career Center lobbies and waiting areas, in language(s) identified as language used by Limited English Proficient persons, informing customers of their right to free interpreter services and inviting them to identify themselves as persons needing language assistance;
- Use of "I Speak Cards" or similar resources by Career Center staff and other customer contact personnel so that customers can identify their primary languages;
- Requiring Career Center staff to note the language of the Limited Speaking Proficient customer in his/her record so that all subsequent interaction will be conducted in the appropriate language;
- Employment of staff, bilingual in appropriate languages, in customer contact positions.
- Contracts with interpreting services that can provide qualified interpreters in languages(s) that has been determined the language(s) needs of the population within the delivery area in a timely manner;

- Formal arrangements with community groups for qualified and timely interpreter services by community volunteers;
- An arrangement with a telephone language interpreter line;
- Translation of application forms, instructional, informational and other key documents into appropriate languages other than English. Oral interpretation of documents for persons who speak languages not regularly encountered;
- Procedures for effective telephone communication between Career Center staff and Limited English Proficient persons, including instructions for English-speaking employees to obtain assistance from bilingual staff or interpreters when initiating or receiving calls from Limited English Proficient persons;
- Notice to and training of all staff with respect to service provider's Title VI and Section 188 obligation to provide language assistance to Limited English Proficient persons, and on the language assistance policies and procedures to be followed in securing such assistance in a timely manner;
- Insertion of notices, in appropriate languages, about the right of Limited English Proficient customers to free interpreters and other language assistance, in brochures, pamphlets, manuals, and other materials disseminated to the public and to staff;
- Notice to the public regarding the language policies and procedures, plus notice to and consultation with community organizations that service Limited English Proficient persons regarding problems and solutions, including standards and procedures for using their members as volunteer interpreters;
- Will use the Orientation to Complaint form as a tool whereby the customer is given instruction on how to file a complaint regarding the provision of language assistance or any program service; and
- Appointment of a senior level employee with the Workforce Career Center system to coordinate the language assistance program and ensure that there is regular monitoring of the program. The monitoring reports will be submitted to the Board's monitor.

Contracted Service Providers should not require a beneficiary to use friends or family members as interpreters. Family and friends may not be competent to act as interpreters, since they may lack familiarity with specialized terminology. However, a family member or friend may be used as an interpreter if this approach is requested by the Limited English Proficient (LEP) individual and the use of such a person would not compromise the effectiveness of services or violate the beneficiary's confidentiality, and the beneficiary is first advised that a free interpreter is available.

Basic Skills Deficiencies

Job training courses may include basic skills deficiencies. Basic Skills Deficiencies (literacy and numeracy) training may be offered as a stand-alone service, but must be a part of a continuum of services leading to employment.

Providers must document that basic skills deficiency courses are linked to a participant's job training services and detail when the classes are being provided in relation to other services.

IV. PROCEDURES:

The documentation supporting the need for basic skills deficiency must include a pre- and post-test to identify the need for the training and to measure any change in basic-skills proficiency.

The following assessment tool may be used to document basic skills deficiency when referred from another agency.

- TABE
- ABLE
- CASAS
- Workkeys

TABE is the only assessment tool that should be used by Workforce Solutions of the Coastal Bend to determine Basic Skills Deficiency. If an out of school youth is referred and has already been tested using a test other than TABE, the youth will be required to TABE test in order to capture pre- and post- test scores.

The pre- and post-test to measure basic skills deficiencies must be administered in English.

The pre-test must be administered no earlier than six (6) months prior to, or no later than 60 days following the date of the first Service.

The post-test must be administered no later than one year from the date of the first Service.

The Career Center Contracted Service Provider must retain all pre- and post-test information, including scores and educational functioning levels. The information pertaining to WIA out-of-school youth shall be entered into TWIST.

V. RELATED POLICY INFORMATION:

TWC WD Letter 24-01, Prohibition Against Discrimination Based on Disability or Limited English Proficiency in the Administration of Workforce Services, dtd 6.22.2001

TWC WD Letter 27-07, Intergrated Data Collection and Performance Management, dtd 8.01.2007

TWC WD Letter 34-07, Coordination of Rapid Response Services with Adult Basic Education Providers, dtd 05.27.2007

TWC WD Letter 47-009, Job Training Course Requirements for English as a Second Language Classes, dtd 11.30.2009

VI. RESPONSIBILITIES:

The contract manager must ensure that Workforce Career Center staff is aware and complies with this policy.

VII. FORMS AND INSTRUCTIONS:

TWIST Manual

VIII. DISTRIBUTION:

Board of Directors

Board Staff

Contracted Service Provider Staff

IX. SIGNATURES:

Reviewed by EO Officer

Date

President/CEO

Date