# TEXAS WORKFORCE COMMISSION Adult Education and Literacy Letter

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| **ID****/No:** | AEL XX-XX |
| **Date:** |  |
| **Keyword:** | AEL; XXX |
| **Effective:** | Immediately |

**To:** Adult Education and Literacy Grant Recipients

Adult Education and Literacy Special Project Grantees

Local Workforce Development Board Executive Directors

Commission Executive Offices

Integrated Service Area Managers

**From:** Courtney Arbour, Director, Workforce Development Division

**Subject:** Remote Testing in Adult Education and Literacy

## PURPOSE:

The purpose of the AEL Letter is to provide Adult Education and Literacy (AEL) grantees[[1]](#footnote-2) with information and guidance on remote testing options during the COVID-19 pandemic, including the remote administration and use of

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

## RESCISSION(S):

None

## BACKGROUND:

Governor Greg Abbott declared Texas a disaster site for all 254 counties on March 13, 2020, in response to the COVID-19 pandemic (pandemic). The declaration spurred the complete closure of most educational and workforce development institutions across the state. AEL grantees and their providers responded with an unprecedented transformation from physical site-based services to distance and remote delivery. This conversion created the need to change most aspects of operations, including performance accountability and associated testing, which rely almost exclusively on in-person proctoring between test taker and AEL or testing center staff.

### **Performance Accountability**

TWC understands that performance results for many measures may be impacted by COVID-19, which has closed many schools, halted or slowed enrollments, and paused all physically proctored performance testing as well as high school equivalency testing center operations. TWC anticipates demand for AEL services among existing participants will be impacted and altered as programs move to remote and distance learning options for students with access to distance and remote instruction learning. Additionally, demand may begin to increase as a result of growing unemployment.

TWC also understands that there will be delayed data entry beginning with and during the months following the onset of the pandemic, and that this delay may continue as a result of institutional closures.

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

* We understand that performance on many measures is likely going to be impacted by COVID-19 and efforts to slow its spread;
* It is too early to know what that impact is going to be;
* We will monitor the situation to determine what the appropriate recommendations to agency leadership as well as the Texas Legislative Budget Board, and federal partners are;
* Those recommendations will be informed by what the data shows and that nobody should fail performance solely as a result of COVID-19 and related efforts to slow its spread.

The service delivery disruptions caused by the immediacy of the onset pandemic in March of 2020 will result in a corresponding disruptions as agencies begin the reopen and physical services are possible. (INSERT Language on NLF in the Performance NLF)

### **Remote Testing**

Testing is a major function of a participant’s program of study, as AEL grantees and their providers administer in-person proctored tests to every student admitted to the AEL program, in order to place the individual in an educational functioning level (EFL). Placement of individuals in an EFL via remote testing will provide AEL grantees with the same options provided as with in-person testing, to both determine the skill needs and placement of students, as well as support performance under the National Reporting System (NRS). Additionally, testing with NRS-approved assessments, as allowed in the Texas AEL Assessment Guide, accounts for a large majority of measurable skill gains (MSGs) earned in Texas.

On March 27, 2020, the U.S. Department of Education’s Office of Career, Technical, and Adult Education (OCTAE) released [Program Memorandum OCTAE 20-3](https://www2.ed.gov/about/offices/list/ovae/pi/AdultEd/octae-program-memo-20-3.pdf), which provides general guidance to states on the deployment of remote testing under the NRS. It also provides the basis for the guidance in this AEL letter. Subsequent guidance from OCTAE includes Program Memo OCTAE 20-4 that has additional frequently asked questions related to COVID-19 and a tips sheet on distance learning requirements, “Adult Education Participants in Distance Education.”

Remote delivery of tests requires changes to most aspects of test delivery, as well as an increased need for controls related to test security and protection of personally identifying information (PII). 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 few

TWC anticipates guidance on remote testing to evolve over the next few months as the system adjusts to a remote performance accountability system, and test publishers and local providers find innovation and efficiency in remote testing.

## 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:

**Non-NRS approved test** means a test not approved for performance accountability such the Texas Success Initiative Assessment (TSIA), GED Ready®, HiSET® Interactive Practice Tests, and tests included in commercial learning software programs.

**Pandemic Affected Staff-determined Eligible Students (PASES) Tracker**, means the Microsoft Excel reporting tool providers use to track students which enter the AEL program remotely but are unable to take an NRS-approved pre-test.

**Remote testing**, also referred to as virtual testing, means testing in which the test administrator is separated in location from the participants. This means that the test administrator cannot observe the testing process physically directly and that the participants are usually not in a formal testing environment.

**NRS-approved test** means 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, and CASAS Reading GOALS, CASAS Math Goals, and the CASAS Life & Work Listening and Reading series.

## Test Publisher’s Guidance

**NLF:** AEL grantees must following NRS-approved test publisher’s guidelines on remote testing; any guidance in this letter related to remote testing that conflicts in with the Texas AEL Assessment Guide supersedes it.

## Performance Accountability

**NLF**: AEL grantees must focus efforts on delivering services to current participants and new students seeking AEL services over performance accountability concerns during the pandemic and period after Texas communities begin to transition out of pandemic-influenced social distancing measures.

**NLF**: AEL grantees must be aware that service delivery disruptions caused by the onset of the pandemic in March of 2020 which resulted in the immediate closures of most educational and workforce physical facilities and end to in-person services will impact AEL performance accountability, which relies almost exclusively on on-site proctored testing for MSG and high school equivalency (HSE) and postsecondary components of the credential attainment measures. As TWC monitors the situation and how entities adjust to remote services it will determine what the appropriate recommendations agency leadership, the Texas Legislative Budget Board, and federal partners should take. Recommendations will be informed by what data after data gathered after March of 2020 shows.

**NLF**: AEL grantees must be aware that a grantee will not fail performance solely as a result of the pandemic and related efforts to slow its spread. TWC staff are aware that performance impact may continue to see inconsistencies due to the unevenness of remote-testing availability, the lack of personal computer equipment of testers, tester confidence with or inability to dedicate sufficient time to remote testing, lack of broadband access, and reduced testing administration capabilities, as proctoring shifts to one-on-one and small group remote settings. Expected high-demand of AEL services, due to unemployment, will likely result in a corresponding disruptions as agencies begin the reopen and physical on-site services become available.

**NLF**: AEL grantees must develop remote testing options once remote testing is made available by the test publishers of NRS-approved tests. Additionally, AEL grantees must make every reasonable attempt to test individuals who are receiving services remotely on approved NRS tests once testing at on-site locations resumes.

**NLF**: AEL grantees must document into TEAMS all MSGs for which they have the appropriate documentation, as outlined in AEL Letter 01-18, Change 1, “Educational Outcomes for Adult Education and Literacy —Update.” MSGs must not be entered into TEAMS until documentation is collected and stored in the participant’s file. Documentation must be collected within 30 days of achievement of the MSG, or as reasonably possible due to pandemic closures.

**NLF**: AEL grantees must be aware that’s states may be able to report measurable skill gains (MSGs) other than the achievement of a pre and posttest MSG (Type 1a) using other measures available to AEFLA programs under the MSG, which include the following, as outlined in AEL Letter 01-18, Change 1:

* Postsecondary Enrollment MSG (Type 1b):
* HSE Achievement MSG (Type 2):
* Postsecondary Transcript or Report Card in IET MSG (Type 3):
* Progress Milestone in IET MSG (Type 4):
* Skills Progression in IET MSG (Type 5)

## Standard Operating Procedures

**NLF**: AEL grantees must be aware that when conducting remote testing the following procedures and controls are in place according to the test publisher’s remote testing guidelines as described for each Texas approved NRS test at <https://tcall.tamu.edu/docs/RemoteTestingGuidanceChart.pdf>, and as allowed under [Q7 of OCTAE Memo 20-3](https://www2.ed.gov/about/offices/list/ovae/pi/AdultEd/octae-program-memo-20-3.pdf):

* Pre-Screening and Orientation, as provided for in: The provider has a pre-screening and orientation procedure to:

1. Ensure the individual has access to the equipment and software specifications needed to complete remote testing;
2. Provide advance planning with testers to respond to audio, video, or other technical problems as well as control for unexpected disruptions;
3. Verify the identity of individual testing;
4. Orient the individual to the remote testing process and expectations, and allow time for individuals to practice using equipment in accordance with the test requirements and take practice test questions with the proctor prior to entering the testing room session, if applicable;

* 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 specific to the test

**LF**: AEL grantees may recommend individuals wear headsets and/or earbuds for test security and optimal success, if applicable and allowable under test publisher’s remote testing guidelines.

**NLF**: AEL grantees must be aware that once an individual can be tested using remote testing procedures or using an NRS-approved test appropriate for the individual, class contact time must be tracked in TEAMS. Contact time that was previously tracked in the PASES tracker for the individual may not be entered retroactively in TEAMS.

## Testing on Non-NRS Approved Tests

**NLF**: AEL grantees must be aware that Non-NRS-approved tests will not count toward AEL performance. Given that, TWC understands that testing may be prohibitively difficult or impossible for providers to conduct remote testing for all individuals seeking AEL services. Challenges may result the unevenness of remote-testing availability, the personal computer equipment of testers, tester confidence with or inability to dedicate sufficient time to remote testing, broadband access, and reduced cycle time of testing as proctoring shifts to one-on-one and small group remote settings. As a result of these challenges AEL providers not be able to provide a Texas approved NRS test during the pandemic and after Texas communities begins to transition out of pandemic influenced social distancing and other requirements. During this period online testing using non-NRS-Approved test such as the TSIA, GED READY or Practice HiSET tests associated with online learning software for limited, nonperformance related purposes, until testing can be done on Texas approved NRS tests. These tests must be used only for general placement purposes and to support instruction.

**LF**: AEL grantees may enter non-NRS-approved test on the Assessments screen of TEAMS.

## INQUIRIES:

Send inquiries regarding this AEL Letter to [AELpolicy.clarifications@twc.state.tx.us](mailto:AELpolicy.clarifications@twc.state.tx.us).

## ATTACHMENT(S):

None

## REFERENCE(S):

[PROGRAM MEMORANDUM OCTAE 20-3](https://www2.ed.gov/about/offices/list/ovae/pi/AdultEd/octae-program-memo-20-3.pdf), entitled, “Adult Education and Family Literacy Act and COVID-19 – Frequently Asked Questions”

[PROGRAM MEMORANDUM OCTAE 20-4](https://www2.ed.gov/about/offices/list/ovae/pi/AdultEd/octae-pm-20-4-covid-faqs-final.pdf?utm_content=&utm_medium=email&utm_name=&utm_source=govdelivery&utm_term=), entitled, “Adult Education and Family Literacy Act and COVID-19 – Frequently Asked Questions, Part 2”

National Reporting System [Tip Sheet on Adult Education Participants in Distance Education](https://nrsweb.org/sites/default/files/DistanceEdTipSheet-508.pdf)

AEL Letter 01-18, Change 1, entitled, “Educational Outcomes for Adult Education and Literacy—Update,” <https://twc.texas.gov/files/policy_letters/ael01-18ch1.pdf>

1. For the purposes of this AEL Letter, AEL grantees are entities that receive AEL funds through the Texas Workforce Commission (TWC). [↑](#footnote-ref-2)