

Report to the Legislature

Refugee and Immigrant Services Limited English Proficient (LEP) Pathway

As Required by Section 207(7), Chapter 50,
Laws of 2011 First Special Session

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EXECUTIVE SUMMARY

Section 207 (7), Chapter 50, Laws of 2011 First Special Session requires the Department of Social and Health Services (DSHS or the Department) to report to the Legislature annually on all sources of available funding for refugee and immigrant employment services during the current fiscal year, amounts expended to-date by service type and funding source, the number of participants served, and program outcome data. The Department provides employment services to refugees and immigrants through the Limited English Proficient (LEP) Pathway Program.

Program Overview

The LEP Pathway Program (or Pathway) provides specialized and culturally appropriate services that lead to employment. LEP adults who receive cash assistance through the Temporary Assistance for Needy Families (TANF), State Family Assistance (SFA)¹, or Refugee Cash Assistance (RCA) programs are eligible for LEP Pathway services. Refugees² who are not receiving cash assistance are also eligible for Pathway services as long as they have resided in the U.S. for 5 years or less. LEP Pathway services include employability assessments, pre-employment preparation services, English as Second Language (ESL) training, job search, skills training, employment placement assistance, and job retention services. Additionally, Work Experience (WEX) or Community Services (CS) placements are available to TANF recipients.

The LEP Pathway program is administered by the Office of Refugee & Immigrant Assistance (ORIA) in the Economic Services Administration, Community Services Division of DSHS. Pathway services are provided through ORIA's contracts with community-based organizations (CBOs), voluntary refugee resettlement agencies (VOLAGs), the Employment Security Department and other employment agencies. Most ESL training is provided through contracts with local community and technical colleges.

In SFY 2012, several changes were implemented including changing the contract from a payment point driven model to a performance outcome model. This change now requires service providers to meet quarterly performance goals. Additionally, in the last quarter of the state fiscal year, support services for transportation needs were added to the contract that allows service providers to offer participants access to transportation assistance in order to participate in Pathway activities.

¹ State Family Assistance (SFA) is a state-funded TANF program that provides cash assistance to legal immigrant families, students age 19 to 20, and pregnant women who are ineligible to receive assistance through the federally-funded TANF program.

² For purposes of this report, the term "refugee" refers to an individual who is eligible for benefits provided through the federal Refugee Assistance Program. These individuals include refugees, asylees, Amerasians, Cuban/Haitian Entrants, Special Immigrant Visa holders, and victims of human trafficking.

Program Budget

LEP Pathway services are provided with funding from three sources – funds from two sources can only be used for specific clients in the Pathway:

- Temporary Assistance for Needy Families (TANF) funds, federal and state, which can only be used for individuals receiving TANF/SFA cash assistance
- Funds from the federal Office of Refugee Resettlement (ORR) include Refugee Social Services (RSS), which can only be used to serve refugees who have resided in the U.S. for 5 years or less and the Targeted Assistance Grant (TAG) which provides additional funds for the high refugee impact areas (King, Snohomish and Spokane counties)
- General state funds (GF-S) - may be used to serve anyone eligible for LEP Pathway services

The following tables show the total budget for SFY 2013 and SFY 2012 by funding source:

SFY 2013 Budget	SFY 2012 Budget
TANF \$ 3,600,000	TANF \$ 3,600,000
ORR \$ 2,243,388	ORR \$ 2,333,044
GF-S <u>\$ 2,366,000</u>	GF-S <u>\$ 2,366,000</u>
\$ 8,209,388	\$ 8,299,044³

Program Expenditures

As of August 31, 2012 contract expenditures for Pathway services for SFY 2012 totaled **\$ 7,351,226**. This amount does not represent the total amount of expenditures for SFY 2012 as service providers are given 45 days after the end of the service month to submit their invoices, making June 2012 bills due August 15, 2012. ORIA has 30 days from the date of receipt to review and process an invoice for payment; therefore, not all bills have been processed. Initial expenditure data for SFY 2013 was not available since invoices for July come in mid September.

³ The SFY 2012 budget includes an additional \$131,110 in ORR funds not reported in the previous report. This funding was added as a result of both carryover and a transfer of ORR dollars from other ORIA programs.

Program Outcomes

Program outcomes are identified through monthly or quarterly reporting by contractors that accompany invoices submitted for payment. Participant and performance outcomes reported for SFY 2012 as of August 31, 2012 are below:

Services and Outcomes	Number of Participants Served
Number Of LEP Pathway Participants	4,748
# Participants in Employment Services/ESL 4,072	
# Participants in ESL Only Services 655	
Full ESL Level Gains (Levels 1-6)	842⁴
Employment (entered employment)	1,559
Average Hourly Wage At Employment Entry \$9.80 Full-Time \$9.92 Part-Time \$9.58	
Number Of Job Placements With Health Benefits	434
Work Experience (WEX)	142
Community Services (CS)	59
Retention - Employed 30 Days After Job Placement	1,364
Retention - Employed 90 Days After Job Placement	1,080

⁴ Level gains include when a participant achieves all 4 literacy skills (Listening, Reading, Speaking and Writing) in an ESL level. One participant may have multiple level gains in a year.

SFY 2012 REPORT ON LIMITED ENGLISH PROFICIENT PATHWAY SERVICES

BACKGROUND

Washington State has a large and dynamic immigrant community. According to the 2010 U.S. Census, 16.5% of the families in Washington speak a language other than English⁵. In King County, the state's most populous county, 22.9% of the families residing in the county speak a language other than English at home⁶.

According to the Department of Homeland Security, in federal fiscal year 2011 (October 2010 through September 2011), Washington State ranked ninth in the nation in resettling new refugees. Only Arizona, California, Florida, Georgia, Michigan, New York, Pennsylvania and Texas resettled more refugees than Washington⁷. The refugee groups with the highest arrival rate in Washington over the last several years are the Burmese, Bhutanese and Iraqi.

The LEP Pathway program began as a pilot project in King County in May 1999 and was implemented statewide in October 1999 to provide an array of employment services targeted specifically for non-English speaking people from a wide variety of countries and cultural backgrounds. The Pathway provides specialized services to refugees and other WorkFirst parents⁸ with limited English skills to increase their employability and places them into jobs intended to lead to self-sufficiency.

The program aims to provide a single, seamless program for services to increase participants' employability so they can become self-sufficient and successfully integrate into their communities. A participant entering the program receives consistent services despite changes in their immigration status or benefits (TANF, SFA, or RCA).

ORIA provided LEP Pathway services through 29 contracts statewide with 25 providers that represented the following types of organizations:

- Community-based organizations (CBOs)
- Local community and technical colleges
- Voluntary Refugee Resettlement Agencies (VOLAGs)

⁵ U.S. Census Bureau, Quick Facts: <http://quickfacts.census.gov/qfd/states/53000.html>

⁶ U.S. Census Bureau, Quick Facts: <http://quickfacts.census.gov/qfd/states/53/53033.html>

⁷ DHS, Refugee and Asylees:2011 http://www.dhs.gov/xlibrary/assets/statistics/publications/ois_rfa_fr_2011.pdf

⁸ TANF/SFA recipients who are required to participate in employment, job search, or training components to receive cash benefits.

- Employment Security Department (ESD)
- Other organizations serving immigrants and refugees

Of the 29 contracts for LEP Pathway services, 12 service providers provided employment services, 12 provide ESL services and 4 provided both employment and ESL services. The majority of ESL service providers are local community and technical colleges. See **Attachment A** for a list of SFY 2013 contractors.

All Pathway service providers have a history of serving immigrants and refugees. They have close ties to refugee and immigrant communities, are experienced in addressing their needs, and able to provide services in culturally appropriate, language specific ways. Many Pathway providers hire staff that entered the U.S. as refugees thus enriching the program by incorporating personal resettlement experiences. Their knowledge, skills, and personal experience in serving refugees are critical to the success of the program.

POPULATION SERVED

The Pathway program assists all single adults without dependents who receive Refugee Cash Assistance (RCA). RCA recipients are limited to eight (8) months of cash assistance from the day they arrive to the U.S. The statewide monthly average of RCA refugees in SFY 2012 was **376** adults.

In addition to RCA clients, the Pathway also serves these populations if they meet program requirements:

- LEP adults on Temporary Assistance for Needy Families (TANF) assistance. The statewide monthly average of LEP clients on TANF in SFY 2012 was 3,297, or 8% of the total statewide TANF caseload.
- LEP adults on State Family Assistance (SFA). SFA is a state-funded TANF program for legal immigrants who are ineligible for TANF under federal rules. The statewide monthly average of LEP clients on SFA in SFY 2012 was 1,239, or 92% of the total SFA caseload.
- LEP adults with current status as a refugee⁹ who do not receive cash assistance and have resided in the U.S. for 60 months or less.

⁹ For purposes of this report, the term “refugee” refers to an individual who is eligible for benefits provided through the federal Refugee Assistance Program. These individuals include refugees, asylees, Amerasians, Cuban/Haitian Entrants, Special Immigrant Visa holders, and victims of human trafficking.

LEP PATHWAY SERVICES

The LEP Pathway program provides employment and English as a Second Language (ESL) services to employable adults who receive TANF, SFA and RCA program benefits and to refugees who have resided in the U.S. for less than 5 years.

Pathway providers work in partnership with individual DSHS clients and Community Services Office (CSO) staff to identify LEP Pathway work activities the individual must participate in while receiving cash assistance. TANF and SFA recipients must sign an Individual Responsibility Plan (IRP) to acknowledge and agree to participate in these activities. Refugee Cash Assistance (RCA) recipients also need an employability assessment and must be prioritized due to the program's 8 month time limit for cash and medical benefits.

In addition, many of our employment providers work with employers to develop work opportunities and offer assistance to those employers to ensure for a successful job placement.

Most often, Pathway clients participate in employment services coupled with ESL training.

A. Employment Services

Pathway program participants receive an Employability Assessment to determine their educational level, English proficiency, work experience, and barriers to employment. Using results from the Employability Assessment, participants are placed into one or more of these activities to help them find work:

- Job Search Workshops – these may be provided to participants who have recently arrived to the U.S. and have little experience in the U.S. labor market. A Basic Computer and Internet Introduction Workshop may be provided to introduce and train participants in the techniques for online job search.
- Work Experience (WEX) and Community Service (CS) – work activities to improve the employability of LEP TANF parents by providing hands-on experience in a supportive and monitored work environment. Parents will practice positive employee behaviors and learn new job skills.

- Skills Training – Job skills training provided to LEP participants in selected occupations. Participants selected for training should have the skills and abilities to perform the job in the targeted field.
- Job Placement – Job search assistance to participants who are ready to enter the labor market, referrals to employment opportunities that match their background, job skills, English proficiency, and abilities.
- Job Retention Assistance – Continued support is provided for a minimum of ninety (90) days to participants placed into employment by providing worksite advocacy, necessary workplace accommodation including interpretation, worksite conflict resolution, and addressing other issues as appropriate.
- Transportation Support Services – Provides assistance to help participants address transportation needs to participate in LEP Pathway activities.

B. English as a Second Language (ESL)

The most prevalent barrier to employment for refugees and immigrants is their inability to speak English well. Preliterate refugees with little to no education prior to arrival have the most difficult time with learning English. For most refugees and immigrants, the ability to speak English increases their ability to earn higher wage jobs and integrate into their local communities. If their improvement is minimal or slow, they are unlikely to find work. The Pathway's ESL component provides participants with work related English language training to enhance their employability.

The Pathway utilizes the Comprehensive Adult Student Assessment System (CASAS) to assess an individual's English language proficiency for listening and reading and other tests to assess speaking and writing proficiency. ESL level 1 indicates the participant's English proficiency skills are at the low end of the scale, and higher ESL levels indicate higher English proficiencies. **Attachment B** provides detailed descriptions of CASAS proficiency levels.

If the assessment determines that the participant is limited English proficient (ESL levels 1-6), the participant is referred to the LEP Pathway for employment and ESL services. ORIA contracts with local community colleges and community based organizations to develop employment related curriculum and training materials and provide ESL classroom instruction to participants who have been assessed at ESL levels 1-6.

C. Contract and Program Changes for SFY 2012

During SFY 2012 two program changes were made to the Pathway program:

- 1. New Contract Model** – Prior to SFY 2012, employment and ESL client service contracts were payment point driven. Pathway providers earned their contract funding by billing for specific services. As a result of proposed budget reductions in May 2011 for LEP Pathway services for the 2012-2013 Biennium which ranged from 27-54% of the Pathway budget, a workgroup comprising of statewide stakeholders and service providers was convened to discuss ways to address the potential impact on LEP services. Through these discussions, the workgroup recommended a new contract model which allows service providers to efficiently manage their budget with the knowledge that they would receive a certain portion of their contract funding on a monthly basis¹⁰ (80% divided into equal monthly amounts) and earn the remaining portion (20%) by meeting established performance outcomes.

This new model allows service providers the flexibility to customize services for each participant instead of providing pre-determined services in order to earn their contract funding. To receive their monthly portion, providers must submit a monthly report showing the participants served during the report period, the services provided and outcomes achieved. Each provider has the flexibility to establish services they deem beneficial to helping participants enter the workforce (e.g. job search, workshops, work experience (WEX), etc.).

All providers have quarterly performance outcome goals which must be achieved in order to earn the remaining 20% of their contract amount. Contractors who do not meet their annual goals may have their contracts reduced the following year. This is intended to provide additional incentives to achieve negotiated performance outcomes. The 80/20 contracting model meets the performance based outcome criteria for contracting required by the Governor's Executive Order 10-02, Performance Based Contracting.

- 2. Performance Outcome Goals** – With the new contract model, service providers are required to meet their quarterly performance outcome goals in order to earn the remaining 20% of their contract amount. Employment providers must meet employment retention goals which are counted when a participant enters full-time or part-time employment and retains the same job for 30 and 90 days. ESL providers previously received payment every time a participant achieved an ESL level gain in each literacy skill (listening, reading,

¹⁰ ESL service providers report and are compensated on a quarterly basis.

speaking and writing). In the new contract model, ESL performance outcomes or level gains are only reported when a participant achieves a level gain in all four literacy skills.

3. **Transportation Support Services** – A Workgroup made up of stakeholders statewide was convened in March 2012 to develop support services within the Pathway. The provision of transportation assistance is intended to remove any transportation related barriers to participation in approved activities. Transportation support is limited to transit tickets/passes, gas cards and auto repair.

PROGRAM FUNDING

There are three funding sources for Pathway services: funds from ORR, TANF, and GF-S. These funds are combined into a single funding stream that is used to provide Pathway employment and ESL services. The following chart shows total available funding the Pathway for:

SFY 2013 Budget	SFY 2012 Budget
TANF \$ 3,600,000	TANF \$ 3,600,000
ORR \$ 2,243,388	ORR \$ 2,333,044
GF-S <u>\$ 2,366,000</u>	GF-S <u>\$ 2,366,000</u>
\$ 8,209,388	\$ 8,299,044¹¹

There are specific requirements for each funding source listed above:

TANF funding can only be used for employment services to TANF recipients. This funding is not restricted by immigration status and can be used to serve any LEP adult receiving TANF/SFA.

Under federal rules, ORR funding can only be used to serve refugees statewide who have been in the country for 60 months or less. In addition, a portion of ORR funding is targeted to refugee residing in three counties in our state because of the high concentration of refugees living in them. These three counties are King, Snohomish, and Spokane.

General Funds-State has the most flexibility as it can be used for anyone in the Pathway, including those ineligible for federal assistance because of their immigration status.

¹¹ The SFY 2012 budget includes an additional \$131,110 in ORR funds not reported in the previous report. This funding was added as a result of both carryover and a transfer of ORR dollars from other ORIA programs.

PROGRAM DISBURSEMENTS¹²

The total budget amount listed in the previous section, Program Funding, represents the maximum funding ORIA may issue in contracts to cover services for a fiscal year. Service providers must provide eligible services and bill the Department in order to receive disbursements from this budget.

The following are expenditures for SFY 2012 for LEP Pathway services by funding source and service type:

Total LEP Pathway SFY 2012 Expenditures

Service	TANF		Total TANF
	Federal	State	
Employment	\$ 1,414,486.45	\$ 566,449.51	\$1,980,935.96
ESL Services	\$ 647,491.80	\$411,578.00	\$1,059,069.80
Total	\$2,061,978.25	\$ 978,027.51	\$3,040,005.76

SFY 2012 Federal ORR RSS/TAG and State General Fund (GF-S) Expenditures

Service	ORR (Federal)		State
	RSS	TAG	GF-S
Employment	\$ 149,499.13	\$ 1,162,077.00	\$ 1,293,087.05
ESL Services	\$ 676,708.92	\$ 141,361.00	\$ 888,487.28
Total	\$ 826,208.05	\$1,303,438.00	\$ 2,181,574.33

¹² Expenditure amounts are current as of August 31, 2012. Slight adjustments will occur as all invoices for disbursements for SFY 2012 (ended June 30, 2012) have not been processed.

PROGRAM OUTCOMES¹³

Program outcomes are identified through the invoices service providers submit for payment. As of the writing of this report, it is too early to report on current SFY 2013 outcomes therefore we are providing outcome data for SFY 2012:

Services and Outcomes	Number of Participants Served
Number Of LEP Pathway Participants	4,748
# Participants in Employment Services/ESL 4,072	
# Participants in ESL Only Services 655	
Full ESL Level Gains (Levels 1-6)	842¹⁴
Employment (entered employment)	1,559
Average Hourly Wage At Employment Entry \$9.80	
Full-Time \$9.92 Part-Time \$9.58	
Number Of Job Placements With Health Benefits	434
Work Experience (WEX)	142
Community Services (CS)	59
Retention - Employed 30 Days After Job Placement	1,364
Retention - Employed 90 Days After Job Placement	1,080

¹³ Outcome data are current as of August 31, 2012. Slight changes may occur as contractors submit outcome data for SFY 2012 after the report run date.

¹⁴ Level gains include when a participant achieves all 4 literacy skills (Listening, Reading, Speaking and Writing) in an ESL level. One participant may have multiple level gains in a year.

CHALLENGES AND SUCCESS

Refugees can face significant challenges to success. Most come from areas of political and social strife, and some have been living in refugee camps for years or even decades before coming to the U.S. In addition, some refugees suffer from post-traumatic stress disorder as a result of their struggles prior to their arrival. Despite these challenges, they have overcome adversity and are determined to improve their own lives and the lives of their children when they resettle in the U.S.

For all newcomers, having employment is the key to a family's ability to become self-sufficient and successfully integrate into their community. However, many new arrivals cannot speak English, some cannot read or write in their own language, and many need to develop new job skills to become employable in a scarce job market. In addition, cultural differences also enter into the picture. For some groups, there are cultural norms against having women or individuals over 50 years old in the workplace. In those cultures, women may be expected to care for the family and those who are older are considered "elders," beyond employment age.

The Pathway program addresses these issues and many other needs of LEP participants and the challenges they face. The goal is to prepare participants for self-sufficiency. Participants are referred to employment and ESL service providers close to their home and most are able to access services immediately. Through other funding, many Pathway providers are able to help address other barriers that relate to their self-sufficiency needs such as medical, education, housing, and immigration. Providers also have extensive partnerships with existing community resources that are also helpful.

Pathway providers work closely with local businesses and have established close ties with employers who are willing to hire LEP individuals. Some employers will hire participants based on the service provider's reference, especially when the participant has no U.S. work experience. Employers are interested in hiring Pathway participants because they often demonstrate a strong work ethic and willingness to learn.

Despite dwindling resources and the barriers participants face, Pathway providers have been successful in preparing participants for employment by offering them an array of services to enhance their employability. Participants continue to show their resilience and ability to assimilate more quickly by attending classes and workshops, working closely with their employment counselors and accepting available employment.

ATTACHMENT A

SFY 2013 LEP PATHWAY CONTRACTORS

Contractor	Service	Award Amount
Asian Counseling & Referral Services	EMP	\$174,647
Bellingham Technical College	ESL	\$43,762
Big Bend College	ESL	\$25,961
Clark College	ESL	\$242,713
Columbia Basin College	ESL	\$77,697
Community Colleges of Spokane	ESL	\$352,737
Employment Security- Spokane	EMP	\$142,166
Highline Community College	ESL	\$385,217
Jewish Family Service	EMP	\$448,958
Lutheran Community Services NW	ESL	\$145,816
Neighborhood House	EMP	\$109,765
North Seattle Community College	ESL	\$39,111
Partners in Careers	EMP	\$212,633
Ready By Five	ESL	\$32,966
Refugee & Immigrant Services NW	Both	\$722,450
Refugee Federation Service Center	EMP	\$1,226,223
Refugee Women's Alliance	Both	\$733,366
Renton Technical College	ESL	\$315,568
Shoreline Community College	ESL	\$42,333
South Seattle Community College	ESL	\$359,372
Tacoma Community House	Both	\$434,853
TRAC Associates – King County	EMP	\$943,435
TRAC Associates – Pierce County	EMP	\$127,149
TRAC Associates – Snohomish County	EMP	\$35,837
TRAC Associates – Thurston County	EMP	\$23,939
World Relief - King Affiliate	Both	\$404,619
World Relief – Spokane Affiliate	EMP	\$232,497
World Relief – Tri-Cities Affiliate	EMP	\$173,598
Total		\$8,209,388

EMP- Employment Provider

ESL- ESL provider

Both- Provides both employment and ESL

ATTACHMENT B
ESL LEVELS

Comprehensive Adult Student Assessment Systems (CASAS)
Score Correlation

ESL Level	Description	Score Range
ESL 1	<p style="text-align: center;">Beginning Literacy / Pre-Beginning ESL</p> <p>Listening/Speaking: Functions minimally, if at all, in English. Communicates only through gestures and a few isolated words.</p> <p>Reading/Writing: May not be literate in any language.</p> <p>Employability: Can handle very routine entry-level jobs that do not require oral or written communication in English and in which all tasks are easily demonstrated. Employment choices would be extremely limited.</p>	180 and below
ESL 2	<p style="text-align: center;">Low Beginning ESL</p> <p>Listening/Speaking: Functions in a very limited way in situations related to immediate needs; asks and responds to basic learned phrases spoken slowly and repeated often.</p> <p>Reading/Writing: Recognizes and writes letters and numbers and reads and understands common sight words. Can write own name and address.</p> <p>Employability: Can handle only routine entry-level jobs that do not require oral or written communication in English and in which all tasks are easily demonstrated.</p>	181-190
ESL 3	<p style="text-align: center;">High Beginning ESL</p> <p>Listening/Speaking: Functions with some difficulty in situations related to immediate needs; may have some simple oral communication abilities using basic learned phrases and sentences.</p> <p>Reading/Writing: Reads and writes letters and numbers and a limited number of basic sight words and simple phrases related to immediate needs. Can write basic personal information on simplified forms.</p> <p>Employability: Can handle routine entry-level jobs that involve only the most basic oral or written communication in English and in which all tasks can be demonstrated.</p>	191-200
ESL 4	<p style="text-align: center;">Low Intermediate ESL</p> <p>Listening/Speaking: Can satisfy basic survival needs and very routine social demands. Understands simple learned phrases easily and some new simple phrases containing familiar vocabulary, spoken slowly with frequent repetition.</p>	201-210

ESL Level	Description	Score Range
	<p>Reading/Writing: Can read and interpret simple material on familiar topics. Able to read and interpret simple directions, schedules, signs, maps, and menus. Can fill out forms requiring basic personal information and write short, simple notes and messages based on familiar situations.</p> <p>Employability: Can handle entry-level jobs that involve some simple oral and written communication but in which tasks can also be demonstrated and/or clarified orally.</p>	
ESL 5	<p style="text-align: center;">High Intermediate ESL</p> <p>Listening/Speaking: Can satisfy basic survival needs and limited social demands; can follow oral directions in familiar contexts. Has limited ability to understand on the telephone. Understands learned phrases easily and new phrases containing familiar vocabulary.</p> <p>Reading/Writing: Can read and interpret simplified and some authentic material on familiar subjects. Can write messages or notes related to basic needs. Can fill out basic medical forms and job applications.</p> <p>Employability: Can handle jobs and/or training that involve following basic oral and written instructions and diagrams if they can be clarified orally.</p>	211-220
ESL 6	<p style="text-align: center;">Advanced ESL</p> <p>Listening/Speaking: Can satisfy most survival needs and social demands. Has some ability to understand and communicate on the telephone on familiar topics. Can participate in conversations on a variety of topics.</p> <p>Reading/Writing: Can read and interpret simplified and some non-simplified materials on familiar topics. Can interpret simple charts, graphs, and labels; interpret a payroll stub; and complete a simple order form; fill out medical information forms and job applications. Can write short personal notes and letters and make simple log entries.</p> <p>Employability: Can handle jobs and job training situations that involve following oral and simple written instructions and multi-step diagrams and limited public contact. Can read a simple employee handbook. Persons at the upper end of this score range are able to begin GED preparation.</p>	221-235
	Exit ESL Program	236