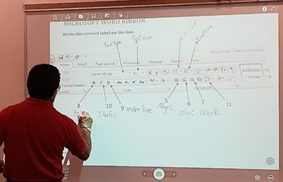
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**ADULT EDUCATION PROGRAM MANAGER RESPONSIBILITIES MANUAL**



**Commonwealth of Virginia**

**Department of Education**

**P.O. Box 2120**

**Richmond, Virginia 23218-2120**

**August 2023**

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## PURPOSE AND PARTICIPANT ELIGIBILITY

The purpose of theAdult Education and Family Literacy Act (AEFLA), title II, Sec. 202 of the *Workforce Innovation and Opportunity Act (WIOA) of 2014,* is to create a partnership among the federal government, states, and localities to provide, on a voluntary basis, adult education and literacy activities, in order to:

* assist adults to become literate and obtain the knowledge and skills necessary for employment and economic self-sufficiency;
* assist adults who are parents or family members to obtain the education and skills that are necessary to becoming full partners in the educational development of their children and lead to sustainable improvements in the economic opportunities for their family;
* assist adults in attaining a secondary school diploma and in the transition to postsecondary education and training, including through career pathways; and
* assist immigrants and other individuals who are English language learners in improving their reading, writing, speaking, and comprehension skills in English; mathematics skills; and acquiring an understanding of the American system of government, individual freedom, and the responsibilities of citizenship.

An eligible individual for adult education services (Sec. 203(4)) is one:

(a) who has attained 16 years of age;

(b) who is not enrolled or required to be enrolled in secondary school under state law (in Virginia, compulsory school attendance age is 18 years of age); and

(c) who

i) is basic skills deficient;

ii) does not have a secondary school diploma or its recognized equivalent, and has not achieved an equivalent level of education; or

iii) is an English language learner.

Because the compulsory attendance age is 18 in Virginia, providers must document that eligible individuals meet the age component of the definition above by checking the student’s age and documenting that they have been excused from the compulsory school attendance requirement (section Overview of Federal and State Regulations, subsection: State Code and Regulations for the types of documentation required.)

Providers determine the basic skills deficiency component of the definition by administering an approved pre-test (see the [*Assessment and Distance Education Policy for Virginia Adult Education and Literacy Programs*](https://www.doe.virginia.gov/teaching-learning-assessment/specialized-instruction/adult-education/program-policy-guidance)). Adults who are assessed to have academic skills below those that would support success in postsecondary education may be “basic skills deficient” and eligible to attend, *even if* they have earned a high school diploma or recognized equivalent. Many adults with a high school diploma or equivalent may benefit from a skills refresher of academic and workforce preparation skills as they pursue further education, training, or employment. For English language learners, AEFLA does not require a basic skills deficiency determination, simply a need to improve English proficiency.

Funding made available through Sec. 231 provides adult education in community settings in the program areas of adult basic education, adult secondary education, English language acquisition, family literacy, workplace literacy, and integrated education and training.

The purpose of the funding under Sec. 225, Corrections Education and Other Institutionalized Individuals (called C&I), is to support educational programs for incarcerated individuals in correctional institutions and other institutionalized individuals to strengthen their knowledge and skills to promote successful re-entry into society. The C&I-funded instruction must give priority to serving individuals who are likely to leave the correctional institution within five years of participation in the program. Such funds may not be used for participation in postrelease programs or services.

Integrated English literacy and civics education (IELCE) is both an allowable activity for Sec. 231 funds and a program funded in Sec. 243. A portion of the federal award made to states is designated for IELCE programs under Sec. 243. The purpose of the IELCE program is to enable adult English Language Learners (ELL), including professionals with degrees and credentials in their native countries, to increase their proficiency in reading, writing, and comprehension skills in English and mathematics using standards-based instruction in order to understand and navigate American systems of government, individual freedom, and responsibilities of citizenship while preparing for and placing them in unsubsidized employment for high demand industries that lead to a family-sustaining wage. All IELCE programs must offer the opportunity for participants to enroll in at least one integrated education and training (IET); however, there is no requirement that all IELCE participants be enrolled in this component. See a [recorded tutorial](https://www.youtube.com/watch?v=qZNj0JS305Q&feature=youtu.be) on the requirements of this program.

For all AEFLA-funded services, the VDOE encourages programs to request students to provide their Social Security Numbers (SSN) upon intake. Social Security Numbers are critical for conducting data matches and evaluating performance for federal reporting purposes. Students should be assured that disclosure is not mandatory, that personal information will not be shared, and that disclosure is requested only for the purpose of data matching. Providers may not deny services to individuals who are unwilling to disclose their SSNs.

## OVERVIEW OF FEDERAL AND STATE REGULATIONS

### Federal Legislation and Regulations

This section provides links and full citations to the federal laws and regulations that govern adult education. Additional information about how these laws and regulations impact various program manager responsibilities is included in other sections of this manual.

#### The Workforce Innovation and Opportunity Act (WIOA)

For the Workforce Innovation and Opportunity Act (WIOA), the law, or “statute,” was further defined with extensive regulations. Federal Program Memos have provided further guidance and technical assistance for implementation. These are linked and referenced here. The VDOE includes citations of the federal source(s) whenever possible in developing policy and technical assistance for providers.

The law, or “statute”: [Workforce Innovation and Opportunity Act](https://www.gpo.gov/fdsys/pkg/PLAW-113publ128/pdf/PLAW-113publ128.pdf) (WIOA) was signed into law (Public Law 113-128) on July 22, 2014. This Act reauthorizes the Adult Education and Family Literacy Act (AEFLA), which is title II in the law.

The regulations: The U.S. departments of Labor and Education collectively issued regulations to implement WIOA through the Code of Federal Regulations (CFR) published in January 2019:

* [AEFLA Program-Specific Regulations (Measuring Educational Gain in the NRS)](https://gov.ecfr.io/cgi-bin/text-idx?SID=a456999f49dfdea587e1bd12a067235f&mc=true&node=pt34.3.462&rgn=div5): 34 CFR part 462
* [AEFLA Program-Specific Regulations](https://gov.ecfr.io/cgi-bin/text-idx?SID=a456999f49dfdea587e1bd12a067235f&mc=true&node=pt34.3.463&rgn=div5): 34 CFR part 463, subparts A-G
* [Sec. 188 Implementation of the Nondiscrimination and Equal Opportunity Provision of WIOA](https://www.govinfo.gov/content/pkg/FR-2016-12-02/pdf/2016-27737.pdf): 29 CFR Part 38
* WIOA Joint Regulations ([Unified and Combined State Plans](https://gov.ecfr.io/cgi-bin/text-idx?SID=a456999f49dfdea587e1bd12a067235f&mc=true&node=pt34.3.463&rgn=div5#sp34.3.463.h), [Performance Accountability](https://gov.ecfr.io/cgi-bin/text-idx?SID=a456999f49dfdea587e1bd12a067235f&mc=true&node=pt34.3.463&rgn=div5#sp34.3.463.i), and the [One-Stop System Joint Provisions](https://gov.ecfr.io/cgi-bin/text-idx?SID=a456999f49dfdea587e1bd12a067235f&mc=true&node=pt34.3.463&rgn=div5#sp34.3.463.j)): 34 CFR part 463, subparts H-J

Program Memos: [AEFLA-specific memos](https://www2.ed.gov/policy/adulted/guid/memoranda.html) are issued by the U.S. Department of Education, Office of Career, Technical, and Adult Education.

AEFLA legislation identifies funding caps and minimum amounts (ceilings and floors) for the various required funding streams. There are two components of the total federal award made to the VDOE: the basic federal award and a set aside award identified for the IELCE program. The amount set aside for IELCE is based upon a formula used by the federal Department of Education that takes immigrant populations into account.

States must follow the requirements listed below:

* States may use up to five percent of the basic federal award for state administration (Sec. 221).
* States may use up to 12.5 percent of the basic federal award for state leadership activities (Sec. 223).
* States must award 82.5 percent of the basic federal award to eligible providers for Sec. 231 and Sec. 225 programming. Up to 20 percent of this amount may be used for Sec. 225 programming.
* States must use 95 percent of the funds identified as set aside for the IELCE program for Sec. 243 programming and may use up to five percent for state administration of the program.

**Supplement not Supplant.** AEFLA Sec. 241(a) states, “Funds made available for adult education and literacy activities under this title shall supplement and not supplant other State or local public funds expended for adult education and literacy activities.” This fiscal principle means that federal funds may not be used to pay for services, staff, programs, or materials that would otherwise be paid with state or local funds or used to provide services the state or local agency is required to make available under other federal, state, or local laws.

Federal funds may be extended (supplemented) with the use of state, local, or private funds, but federal funds may not be used in place of (supplant) such funds. For example, if a provider receives a local grant for computer equipment, the provider may not later decide to use federal funds to purchase the equipment so that the local grant funds could be used for a different purchase. However, the opposite scenario is allowable. In this same example, a provider may use local grant funds to purchase computer equipment that had been included in their federal budget plan and amend their budget to use the federal funds for a different allowable purchase.

#### Uniform Guidance

The federal Office of Management and Budget (OMB) publishes the Uniform Guidance (Guidance) that applies to the work of all federal agencies. The Guidance ([2 CFR § 200](http://www.ecfr.gov/cgi-bin/text-idx?SID=6214841a79953f26c5c230d72d6b70a1&tpl=/ecfrbrowse/Title02/2cfr200_main_02.tpl)) streamlines and consolidates government requirements for receiving and administering federal awards so as to reduce administrative burden and improve outcomes. It was published in the Federal Register ([79 Fed. Reg. 75871](http://www.gpo.gov/fdsys/pkg/FR-2014-12-19/pdf/2014-28697.pdf)) on December 19, 2014, and became effective for new and continuation awards issued on or after December 26, 2014. See the U.S. Department of Education’s technical assistance [webpage](https://www2.ed.gov/policy/fund/guid/uniform-guidance/index.html) for resources on the Guidance. Three key sections of the Guidance are included here.

**Cost Principles.** For the fiscal responsibility purposes of an AEFLA grant, a key section is [2CFR, Subpart E: Cost Principles](https://www.ecfr.gov/current/title-2/part-200/subpart-e). This section sets the stage for grantees to establish processes, procedures, and principles so that federal funds are used wisely and judiciously. The opening policy section, Sec. 200.400, establishes that the grantee “is responsible for the efficient and effective administration of the Federal award through the application of sound management practices.” Throughout the Guidance, grantees are asked to be prudent in their decisions and purchases.

Program managers should bookmark or print Subpart E of the Guidance for regular reference. It is expected that program managers and fiscal agents are familiar with and abide by these cost principles. Check the Guidance for common issues concerning allowability of costs (Sec. 220.403), reasonable costs (Sec. 200.404), prior written approval (Sec. 200.407), employee health and welfare costs (Sec. 200.437), equipment and other capital expenditures (Sec. 200.439), participant support costs (Sec. 200.456), rental costs of real property and equipment (Sec. 200.465), and travel costs (Sec. 200.474) as well as a number of other issues.

**Internal Controls.** Another key section in the federal Uniform Guidance speaks to the importance of internal controls, found in [2CFR, Sec. 200.303](https://www.govinfo.gov/content/pkg/CFR-2014-title2-vol1/xml/CFR-2014-title2-vol1-part200.xml#seqnum200.303). These concepts are foundational to proper grant management. Internal controls give reasonable assurance that the organization will achieve its objectives through effective and efficient operations, reliable reporting, and compliance with applicable laws and regulations. Those assurances are based upon sound processes and procedures and with transparent and accountable reporting. For example, in fiscal management, a key process is “segregation of duties,” referring to an established, routine system of review and oversight for expenditures and reporting to ensure that no one individual can control a process from start to finish. Annual review processes within a program improvement cycle and annual local monitoring activities are also processes that support strong internal controls so that inefficiencies or inconsistencies can be identified and addressed.

The U.S. Department of Education has developed a presentation and toolkit to assist grantees with appropriate internal controls and the compliance with the Uniform Guidance. See the [online resources](https://www2.ed.gov/policy/fund/guid/uniform-guidance/internal-controls.html). Found here are the slides that share the definitions of internal controls as well as give factors to consider when determining allowable, reasonable, and allocable costs. The Manager’s Checklist, which can be found in the file named Manager’s Quick Assessment in the Toolkit at the same link, provides practitioner-friendly language that a leadership team may use as a means to improve the transparency and accountability of a program’s internal controls.

**Records Retention.** Financial records, supporting documents, statistical or data records, and all other records pertinent to managing a federal award are required by [2CFR, Sec. 200.333](https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=1&SID=3cd003b2d9401d174b3a7e3b822a52b9&ty=HTML&h=L&mc=true&n=pt2.1.200&r=PART#se2.1.200_1333) to be retained for a period of at least three years from the date of submission of the final expenditure report except where state regulations require a longer retention; see the Records Retention Policy of the Library of Virginia referenced below.

#### Family Educational Rights and Privacy Act (FERPA)

The Family Educational Rights and Privacy Act (FERPA, found at [20 USC 1232g; 34CFR Part 99](https://www.govinfo.gov/app/details/CFR-1999-title34-vol1/CFR-1999-title34-vol1-part99)), is the existing federal law that provides for the protection of a student’s personally identifiable information (PII) and education records. “Education records” are those records that are: (1) directly related to a student and (2) maintained by an educational agency or institution or by a party acting for the agency or institution. Under FERPA, an educational agency or institution may not disclose PII from students’ education records without consent unless the disclosure meets an exception under FERPA. The U.S. Department of Education’s Student Privacy Policy Office’s [website](https://studentprivacy.ed.gov/) has a broad overview of FERPA and related issues, including explanations of applicability to online and virtual learning. A companion [website](https://studentprivacy.ed.gov/?src=fpco) has information for students, parents, and educators about their rights and roles under FERPA.

#### General Education Provisions Act (GEPA)

Section 427 of the U.S. Department of Education’s General Education Provisions Act (GEPA) requires recipients (the VDOE) and subrecipients, such as the AEFLA grantees, to describe the steps they will take to ensure equitable access to and participation in the federally assisted program for students, teachers, and other program beneficiaries with special needs. A GEPA statement is required from all AEFLA applicants in each year’s application.

#### American Disabilities Act (ADA) as Amended

The [Americans with Disabilities Act of 1990 (ADAA), as amended by the ADA Amendments Act of 2008](https://www.ada.gov/pubs/adastatute08.htm) (P.L. 110-325), ensures non-discrimination in three broad titles within the legislation: employment (title I), state and local government (title II), and public accommodations and commercial facilities (title III). It emphasizes that the definition of disability should be construed in favor of broad coverage of individuals to the maximum extent permitted by the terms of the ADA and generally not require extensive analysis. The effect of the amendments is to make it easier for individuals seeking protection under the ADA to establish that they have a disability within the meaning of the ADA.

WIOA Sec. 188, *Implementation of the Nondiscrimination and Equal Opportunity Provisions of WIOA*, articulates the responsibilities of all WIOA grantees to ensure nondiscrimination and provide service to all individuals, basing guidance in the ADA as Amended. See more on serving individuals with disabilities in Program Management and Delivery, subsection: Serving Adults with Disabilities.

#### Certifications

There are several federal certifications that are applicable to an AEFLA grant that are either included in the application package or in a grant award notification package.

The Disclosure of Lobbying Activities (SF-LLL) form provides certification that the grantee will not use federal funds for lobbying. This form may be marked as “Not Applicable” in boxes 10a and 10b to indicate that no lobbying of officials is conducted using grant funds by either staff or students. This form is submitted with the application.

The Federal Funding Accountability and Transparency Act (FFATA or Transparency Act - P.L.109-282, as amended by section 6202(a) of P.L. 110-252), requires the Office of Management and Budget (OMB) to maintain a single, searchable [website](http://www.USAspending.gov) that contains information on all federal spending awards. Two reports are required of subrecipients, such as AEFLA providers, by this Act. The first FFATA report documents the congressional districts covered by the grant. This form is completed by the fiscal agent and returned to the state office after the grant award notification is received. The second FFATA report documents executive compensation. The VDOE requires this as a condition of award, and the form is provided with the grant award notification. School divisions complete only one of these forms each year for the VDOE and do not need to submit one for each federal grant they receive. (They are not required to be submitted for the AEFLA awards.) Other providers, such as community colleges and community-based literacy organizations, complete the form after the grant award notification is received by the fiscal agent and then return it to the state office.

### State Code and Regulations

This section provides links and full citations to the state laws in the *Code of Virginia* (“the *Code*”) and regulations that apply as a grantee of a state agency. Additionally, regional program managers should understand the processes that lead to the passage of the state budget. More information about how these laws and regulations impact various program manager responsibilities are included in other sections of this manual.

#### The Code of Virginia

The *Code of Virginia* contains the laws passed by the General Assembly and signed by the Governor. Directly pertaining to the provision of adult education is Title 22.1, Chapter 13, Article 3. Adult Education. Within this are the subsections that establish duties of the State Board which includes the duty to develop adult education programs within each school division and encourage coordination among school boards, state, federal, and local public and private entities among others. The authority given to local school boards is to provide adult education programs for their residents, charge appropriate fees, and seek to ensure that participants have the opportunity to earn a high school equivalency (HSE) credential. The implication of these topics is explored more fully in the section on writing a regional Memorandum of Understanding (MOU) (section Program Management and Delivery, subsection: Cultivating Regional Cooperation and Coordination). The sections of the *Code* are linked here:

[Sec. 22.1-223](https://law.lis.virginia.gov/vacode/title22.1/chapter13/section22.1-223/): Definitions

[Sec. 22.1-224](https://law.lis.virginia.gov/vacode/title22.1/chapter13/section22.1-224/): Duties of State Board

[Sec. 22.1-225](https://law.lis.virginia.gov/vacode/title22.1/chapter13/section22.1-225/): Authority of school boards

Virginia has set the compulsory school attendance age at 18 years of age; the section of the *Code* that details exemptions for 16 and 17-year-olds which may allow them to attend adult education and earn a high school equivalency are embedded in Title 22.1, Chapter 14, Article 1:

[Sec. 22.1-254](https://law.lis.virginia.gov/vacode/title22.1/chapter14/): Compulsory school attendance

[Sec. 22.1-254.2](https://law.lis.virginia.gov/vacode/22.1-254.2/): Eligibility for testing

The *Code* also provides for school boards’ discretion on the provision of instruction in languages other than English in Title 22.1, Chapter 13, Article 1, [Sec. 22.1-212.1](https://law.lis.virginia.gov/vacode/title22.1/chapter13/section22.1-212.1/), which itself references Title I General Provisions, [Sec. 1-511](https://law.lis.virginia.gov/vacode/1-511/): *English designated the official language of the Commonwealth*. The statement in Sec. 1-511 does not prohibit dissemination of outreach and recruitment information or instruction in languages other than English.

#### Virginia Acts of Assembly Biennial Budget

Virginia operates under a two-year (biennial) budget cycle. Each year the Governor prepares the proposed budget bill for introduction to the General Assembly. The bill is initially adopted in even-numbered years and amended in odd-numbered years. Amendments to the budget bill can add, modify, endorse, or delete items in the Governor's proposed budget. Before the General Assembly adjourns each year, a conference committee resolves any differences between the versions passed by the two houses.

The VDOE awards funds based on the approved state budget; however, distribution of funds to grantees is not available until the funds have been deposited with the Department. Virginia Lottery funds are not deposited until January.

Current and prior years’ budget information may be located [online](https://budget.lis.virginia.gov/).

#### Statement of Assurances

The Statement of Assurances form that accompanies each grant application details many of the key responsibilities of an AEFLA- and state-funded provider covered in this manual. This document, signed by the fiscal agent’s school division superintendent, community college president, or executive director, attests that the provider and its consortium members, if applicable, are aware of and will abide by these responsibilities. These assurances form the foundation of the annual program monitoring self-assessment survey (see section Program Improvement) as well as the site visit monitoring protocol.

#### Records Retention Policy of the Library of Virginia

The VDOE follows records retention guidelines published by the Library of Virginia. See the most updated Library of Virginia records retention [schedules](https://www.lva.virginia.gov/agencies/records/retention.asp) and additional information. Providers are expected to follow these guidelines. Confer with your fiscal agent and the state office regarding any discrepancies between record retention policies between agencies. Refer to *General Schedules for State Agencies* for information regarding schedules for fiscal and administrative records and *Specific Schedules for the Department of Education* for student records. While programs are not required to submit records destruction forms to the state office for approval, care should be taken to document retention and destruction of all records. Maintain the official form that indicates the content of destroyed files, creation date, destruction date, destruction method, and name of the individual approving destruction for a minimum of three years for any federal grant related materials.

The State Assurances that accompany the 2023-2025 application state: The Applicant agrees to retain all local program records and local agreements for a minimum of three years from the end date of the competitive award (June 30, 2026) and student release forms for three years after the end of the calendar year in which the record was created.

#### Travel Policy

The VDOE follows travel guidelines published by the Virginia Department of Accounts. Providers are expected to follow the same guidelines. Reimbursements that exceed the approved rates may not be permitted unless justification is provided by the traveler and prior approval secured by the grants manager, but shall not exceed 50 percent over the allowable rate, as per state guidelines. Travel approval including travel estimates should be obtained by the appropriate authority prior to any trip. Check the updated [travel guidelines](https://www.doa.virginia.gov/reference/CAPP/CAPP_Topics_Cardinal/20335-2019-July.pdf).

Out of state travel requests must be submitted for prior approval to the Grants Manager in the state office.

Reminder: All adult education funds are cost reimbursable. Advance purchases, such as airline tickets, cannot be reimbursed until the travel has occurred.

#### VDOE Grant Special Terms and Conditions

Grants awarded through the VDOE must abide by “Attachment A: Special Terms and Conditions” that is distributed with grant award notifications. These terms govern actions by grantees, including:

* ensuring all websites developed meet standards for accessibility,
* creating any materials without claim to intellectual property,
* certifying that fiscal agents and sub-awards have not been suspended or debarred from federal funding,
* including in public statements that the program is funded in whole or in part with federal funding,
* prohibiting text messaging while driving during official grant business, and
* participating in monitoring and reporting.

## MANAGING FEDERAL AND STATE BUDGETS

### Federal and State Funding Streams

When the VDOE receives the annual federal award of AEFLA funds, there are requirements about how it must be allocated and managed. The VDOE is the recipient of the federal award and is given up to 27 months in which to spend those funds. The VDOE makes awards to eligible providers, called “subrecipients” (, for a 12-month grant period based on a multi-year competition process. Any unexpended funds are recouped by the VDOE for reallocation or Innovation Challenge Grant awards in the next fiscal year.

There are three AEFLA funding streams from which awards to eligible providers are made:

Sec. 231 for Adult Education

Sec. 225 for Corrections Education and Other Institutionalized Individuals (C&I)

Sec. 243 for Integrated English Literacy and Civics Education

Once awarded, funds cannot be reprogrammed to another funding stream. That is, if a provider is unable to expend all the funds in the Sec. 225 award, those funds may not be transferred into the Sec. 231 award within the program year. See the section on Planning Allowable Activities by Funding Stream (section: Program Management and Delivery) for more information about programming for these funding streams.

Two funding streams are awarded from the Virginia General Assembly budget as the required state match to the federal AEFLA award: the General Adult Education (GAE) fund and the State Lead Coordinating Agency (SLCA) fund. These funds are awarded to each of the 22 adult education regions in conjunction with the adult education funds. They are not competed separately. Because these funds are declared as match to the federal funds, their expenditures must follow the same regulations and allowable activities (Sec. 221(b)(2)). Unlike federal funds, state funds are awarded for a one-year grant period and cannot be recouped for reallocation.

Other state funds, Race to GED® and PluggedInVA, are made available from Virginia Lottery funds. By Code, lottery funds may be distributed only to local school divisions. Fiscal agents that are not local school divisions must partner with a school division that will serve as the fiscal agent for the lottery funding. Race to GED® funds are allocated based on the same population-based formula used for regional allocation and awarded to one fiscal agent per region annually. Race to GED® funds are not reported as state match. PluggedIn VA funds have shifted from a competitive fund to a formula-driven allocation based on the American Community Survey formula and will be reported as state match. See section Program Management and Delivery for the purposes of these funding streams. These funds are not released to the VDOE until January of the program year and must be fully expended by mid-May. This means that while awards are made in the summer and activities may begin in the first quarter, fiscal agents may not claim reimbursements on expenditures until late January. Race to GED® funds are not declared as state match; therefore, they are not bound by the federal spending guidelines and may, for example, be used to purchase high school equivalency test vouchers.

### Establishing Budgets

Providers submit a budget workbook annually in an Excel template provided by the VDOE. The federal and state funding streams workbooks are formula driven with logic checks to ensure accuracy. Workbooks have extensive instructions in the first worksheet tab. Providers are expected to maintain current, updated workbooks.

When budgeting federal funds, there are two types of costs: administrative and instructional.

Administrative Costs

Each federal award has an allowance of five percent that providers may use toward administrative requirements. The five administrative requirements identified in the WIOA statute are below in **bold** font followed by explanatory text in regular font:

1. **Planning**, which may include portions of the program manager and regional staff time and effort and benefits as they oversee program planning and implementation.
2. **Administration**, **including carrying out performance accountability requirements**, which may include portions of the time and effort and benefits of the data specialist responsible for data entry, reporting, and training.
3. **Professional development**, which includes costs for all staff members (not only those in leadership) to attend professional development events (see an explanation of the distinction between professional development and professional learning communities (PLCs) in section Program Management and Delivery, subsection: Being an Instructional Leader).
4. **Providing adult education and literacy services in alignment with local workforce plans**, including promoting co-enrollment in programs and activities under title I, as appropriate, which may include a percentage of a funded position to serve as a Career Works Center liaison or the time the regional program manager engages with duties for the LWDB.
5. **Carrying out the one-stop partner responsibilities described in WIOA Sec. 678.420, including contributing to the infrastructure and shared costs of the one-stop delivery system**. This cost is usually included as a single line item contribution as negotiated in the MOU with the LWDB (see these duties explained more fully in the Partnership section Alignment with WIOA Partners). (Costs that are associated with offering instructional services in the one-stop, such as classroom rent, would not be included in the Administrative portion of the AEFLA budget.)

It is not necessary to determine percentages of time and effort (i.e., salary) to each requirement. However, it is worth considering leadership team members’ actual percentage of time and effort that is properly charged to administrative funds versus instructional funds (see below). In many programs, staff members play many roles and serve a variety of functions. Administrative funds are very limited; charge only the costs that are required.

If the five-percent cap on administrative funds is insufficient to cover the required elements, applicants may request a waiver on the cap. This request should be submitted on fiscal agent letterhead, provide a justification for the percentage and total dollar figure requested, and submitted with the grant application.

Instructional Costs

*Instructional funds* is the term for the remaining funds of an AEFLA award. In Virginia, a requirement is established that a minimum of 50 percent of the federal allocation in each funding stream be budgeted for instructional delivery costs; that is, time and effort plus benefits. Allowable charges to the instructional fund include:

* instructional time, planning time, and employee benefits, including the participation in PLCs and assessment certification training;
* instructional materials and supplies, including GED® Ready practice test vouchers;
* outreach and recruitment activities and purchases;
* employee time and benefits associated with direct student services, such as for a career coach or navigator;
* assessment supplies (except HSE testing vouchers, see section Program Management and Delivery, subsection: Planning Allowable Activities by Funding Streams);
* equipment, rent of classroom spaces, and utilities (including related Internet and cell service); and
* contracted services such as training for IET cohorts and tutoring services from literacy organizations.

See also [Director’s Memo #018-19](https://www.doe.virginia.gov/home/showpublisheddocument/35392/638054947146570000), *Revisions to Career and Training Services Reporting Guidance*, which provides guidance on which instructional costs associated with career and training services should be documented. Estimates of these costs should be indicated in the initial budget workbook and actual costs must be reported annually. For example, a line item for assessments supplies might indicate that 60 percent of the tests to be purchased are estimated to be used for pre-testing, a career service. In this example, the line item in the budget workbook might read, “Pre- and Post-Assessments (60% C&T).”

Any out-of-state travel, capital improvement to property, or single item over $5,000 must be submitted to the state office for prior approval before committing the funds.

When budgeting state funds, note that state funds are of a single type analogous to instructional funds, no administrative requirements are identified and no local match is required.

The VDOE strongly encourages providers to fully expend all federal and state funds awarded within the grant period. State funds must be expended first as they expire each year and cannot be reallocated. Ideas from program managers on how to “spend to zero” were generated in a program managers’ meeting in 2019. Ideas included:

* keeping a wish list of pre-approved requests so that available funds can be spent quickly,
* setting an internal-to-the-region deadline for expenditures by localities and revert any unobligated funds to the region for reallocation to other localities or regional purchases,
* submitting budget transfers to move unused funds into object code 6000 for instructional materials and assessments that can be purchased in advance of the next program year, and
* splitting purchases that will be shared over multiple funding streams (if your fiscal agent allows this) to fully expend funds.

After the final reimbursement of a grant period, any unexpended federal funds will be removed from fiscal agents’ accounts and will revert to the VDOE for reallocation or competition. These funds are usually available in the second quarter of the program year. Budgets and expenditures of those federal funds follow the same guidelines but must be managed as a separate grant award.

**Reallocation.** Reallocation is the term used to describe unexpended funds from the previous year that are allocated to providers without competition. Sec. 225 funds are generally reverted to Sec. 231 funds at reallocation, although programs may request some of their reallocation to be awarded as Sec. 225 funds for C&I programming. Funds determined for reallocation are allocated to regions based on the same formula as the competitive funds. Sec. 243 leftover funds are awarded based on a formula that corresponds to the enrollment ranges in the application package. Reallocation awards require the submission of a budget which must adhere to all federal funding regulations and allowances including the administrative five percent cap and must be matched with local funds at 15 percent. Once the budget is approved by state staff, the funds are managed through the Online Management of Education Grant Awards (OMEGA) system, or, if awarded to a CBLO, through the paper-based reimbursement system. All reallocation funds must be spent by the end of the grant period.

**Innovation Challenge Grants.** The VDOE may conduct an Innovation Challenge Grant competition with the previous year’s unexpended funds. The Challenge grants are designed to advance state priorities. These awards require the submission of an application and a budget which must adhere to all federal funding regulations and allowances including the administrative five percent cap and must be matched with local funds at 15 percent. Once the application is approved by state staff, the funds are managed through the OMEGA system. These awards offer providers a chance to boost an ongoing initiative, invest in a new partnership, or add additional programming to meet an emerging need. The quick turnaround nature of the application process and the time frame in which to expend the funds contribute to the “challenge.” See a Progress Newsletter [article](https://valrc.org/progress/progress-october-2018-issue/) from 2018 sharing Innovation Challenge Grant lessons learned.

### Allowable and Unallowable Costs

Interpreting allowable costs is rooted in the Uniform Guidance [Cost Principles](https://www.ecfr.gov/current/title-2/part-200/subpart-e) (section Federal Legislation and Regulations). Three key principles should inform thinking on this topic: is the cost “reasonable,” is it “allocable” for the funding source, and would it be considered “prudent?” Refer to the Guidance for reasonable costs (2 CFR 200.404) and allocable costs (2 CFR 200.405).

If a cost proportionally benefits two or more projects or activities, that cost should be allocated to the projects based on the benefit received. For example, if a provider leases a copier that will be used to support activities in multiple AEFLA funding streams (Sec. 231, 225, and 243), the proportional use by each grant should be determined, noted in the budget narrative, and charged accordingly.

Some charges require prior written approval (2 CFR 200.407) before being charged to the federal funds. Some of the items listed in the Guidance are handled through annual budget workbook submissions which result in prior written approvals; other items may become relevant during a grant year. The VDOE is available to discuss these types of purchases or any others in advance of committing funds.

The following chart provides some guidelines on allowability, although individual circumstances may raise additional questions. Use these ideas as guides only and seek prior written approval if you have any concern that a purchase may be disallowed. Because all the adult education funds, state and federal, are cost reimbursable, the VDOE may deny a reimbursement, leaving the fiscal agent to cover the cost with local funds.

**Table 3.1: Examples of Allowable and Unallowable Costs for Federal and State Matching Funds**

| **Cost Item** | **Determination\*** |
| --- | --- |
| Advertising and Public Relations | Allowable with restrictions |
| Alcoholic Beverages | Unallowable |
| Audit Services | Allowable with restrictions |
| Capital Expenditures and Improvements on Buildings | Allowable with restrictions |
| Collections of Improper Payments | Allowable |
| Commencement and Convocation | Unallowable |
| Compensation-Personal Services | Allowable with restrictions |
| Compensation-Fringe Benefits | Allowable with restrictions |
| Conferences | Allowable with restrictions |
| Employee Health and Welfare | Allowable |
| Entertainment | Unallowable |
| Equipment | Allowable with restrictions |
| Fund Raising | Unallowable |
| Goods and Services-Personal Use | Unallowable |
| Insurance and Indemnification | Allowable with restrictions |
| Lobbying | Unallowable |
| Maintenance and Repair | Allowable |
| Materials, Supplies, Computers | Allowable |
| Professional Memberships and Subscriptions | Allowable |
| Pre-award Costs | Allowable with restrictions |
| Publication and Printing | Allowable |
| Recruiting of Employees | Allowable with restrictions |
| Relocation of Employees | Allowable with restrictions |
| Rent of Real Property/Equipment | Allowable with restrictions |
| Student Activity | Unallowable |
| Taxes | Allowable with restrictions |
| Training and Education of Employees | Allowable |
| Travel | Allowable with restrictions |

\*Consult with the VDOE office before making purchases that may be unallowable or to discuss those that state “with restrictions.” These items may not be deemed prudent or a necessary use of the AEFLA funds.

### Match Requirements

Providers must arrange for a 15 percent match to the federal awards. The match may be made as (1) in-kind contributions, (2) cash, or (3) a combination of the two, and match report workbooks require that these are disaggregated when reported. The match may exceed 15 percent but may not be less than 15 percent. The matching requirement may not be met by using other federal funds that the applicant may receive. Likewise, local funds reported as a match against the federal funds may not be used to match another federal grant. Note that reallocation funds and Innovation Challenge Grants (see above) that may be awarded during a program year also require a 15 percent local match. Expenditures must be tracked and reported quarterly by the object codes, identified as either cash or in-kind, and all matching funds must be expended in the program year for which they were claimed.

No matching funds are required for the GAE, SLCA, or PluggedIn VA funds awarded with the regional adult education grant. The GAE, SLCA, and PluggedIn VA funds are used by the state to fulfill the overall state match and maintenance of effort requirements, so providers may not report those funds to fulfill the match requirement.

**Maintenance of Effort.** A factor that affects the required local match is the state’s maintenance of effort requirement. Each eligible provider will be required in subsequent years of a competitive cycle to provide matching funds in an amount that meets or exceeds the previous year’s match total. Providers may shift the percentage of each type of match (cash or in-kind) from year to year.

**Allowable Local Matching Funds.** Matching funds may be cash or in-kind contributions (non-federal funds) by the provider. Match may come from a single source or from multiple sources within the region. Match may occur in one object code, such as personal services, or across the various object codes. Match may be expended and reported in a single quarter or multiple quarters during the grant period. Some considerations for matching funds are listed below:

* All expenditures identified as supported by local matching funds must be for the direct support of program activities.
* When applicable, documentation must be maintained and is required to identify the percentage of support converted to a dollar amount. Common instances of this requirement include salaries, rent, and utilities.
* Rent costs may be declared as match and must be based on the current fair market rental rate in the program area. This applies when state, local school, community college, or other agency property is used as space to support program activities. Determine what the space would cost if it were to be rented by an outside group. Documentation of an appraisal of fair market rental rate for the area is required to be maintained. The percentage-of-use time must be converted to a dollar amount.
* Volunteer hours may be declared as match. To report such hours as match, the cash value of volunteer services per hour must be substantiated and the value reported as in-kind. Consult the Independent Sector Value of Volunteer Time [website](https://independentsector.org/resource/value-of-volunteer-time/) for current, fair rates.

### Program Income

Program income represents the gross income received by the federal grant recipient (the VDOE) or subrecipient (grantees) directly generated by a grant-supported activity or earned as a result of the grant agreement during the grant period. As a condition of the federal award to the VDOE, the VDOE must ensure that any tuition, fees, or other adult education program expense requirements borne by participants must be equitably administered and not reach levels that have an adverse effect on the participation of economically disadvantaged students.

Per state requirements, a provider must have a valid and reliable system for tracking, documenting, and reporting the program income and the expenditure of the program income. Applicants planning to collect program income must provide justification for the need for such income. That justification should include how the cost(s) to participants are determined to be equitably administered and do not reach levels that have an adverse effect on the participation of economically disadvantaged participants.

All adult education program income must be spent on items or services within the scope of the provider’s approved title II activities and be used for activities and expenses that would be considered allowable for the federal grant. Efforts must be made to expend the funds within the fiscal quarter in which they were collected and must be spent in the same fiscal year. Program income may not be used to fulfill local match obligations and may not be used as general funds unless it is directly available to support grant services and is maintained as a separate line item. Expenditures must be tracked and reported quarterly by the object codes. Program income is flexible in that it is not designated within an object code when it is collected and may be used in any object code for allowable purchases.

### Reimbursements

Expenditures are reimbursed through the Online Management of Education Grant Awards (OMEGA), a web-based grant reimbursement system. All providers, except community-based literacy organizations (CBLOs), manage federal and most state funds through OMEGA. CBLOs manage federal reimbursement requests through a paper-based system. Community college fiscal agents must manage the state funds of GAE and SLCA through the paper-based reimbursement requests. The forms are provided by the adult education state team.

Use the OMEGA User’s Guide and [technical assistance resources](https://www.doe.virginia.gov/data-policy-funding/school-finance/budget-grants-management/omega) provided by the VDOE in order to propose a budget as well as request a reimbursement. The accounting [codes](https://www.doe.virginia.gov/home/showpublisheddocument/38652/638063893852400000) are to be used by fiscal agents requesting reimbursements through OMEGA or through paper-based reimbursement requests.

For federal awards, if payroll dates for June expenses fall in July (that is, the pay date is in the next program year) a request for reimbursement for these funds may be submitted with July expenditure dates but should be charged to the fiscal year in which the charges occurred.

**Budget Amendments**. It is to be expected that budget plans may need to be updated as the grants are under way. If the need to shift funds arises, budget amendments are allowed and are handled in two ways. If the funds need to transfer from one object code to another, submit a budget transfer within OMEGA providing sufficient detail in the comments section or in an email to the grant manager. If funds are being transferred within a code but from one planned item to a different item, no budget transfer is required; however, communicate this transfer and any changes in program design with the Grants Manager for tracking purposes.

Maintain a copy of the approved budget workbook with proposed and actual expenditures through the program year. This allows for accurate estimates when transferring funds and planning to expend the funds fully by the end of the grant period.

**Encumbrance Dates**. Because adult education grants (federal and state awards) are “cost reimbursable,” fiscal agents must handle expenditures prior to requesting reimbursements. The SLCA funding is an exception when awarded to school division fiscal agents in which case the fiscal agent receives automatic, recurring payments. Plan carefully for all funds to be fully encumbered before the final date of the grant period or the date of final reimbursement request.

The period of the grant award is July 1 to June 30 of the next year. All federal funds must be encumbered by June 30, and final reimbursements are due to the VDOE in mid-August. State funds expire earlier in the spring. See the Calendar of Due Dates for exact dates; plan to have final reimbursement requests for state funds to the VDOE by mid-May.

**Expenditure Documentation**.Maintain adequate documentation of all expenditures with a level of detail necessary to describe the services received, benefits accrued to the grant program, actual time and effort expended, and the internal controls in place in your organization. For example, if a small purchase was charged to a division’s credit card, maintain the receipt and the signed approval of it that documents where and/or how the purchase is serving the grant (e.g. lockable box for transport of confidential files between satellite campus and main office). Although these documents are not submitted with OMEGA reimbursement requests, they must be available upon request and are a part of an on-site monitoring visit. Records must be maintained according to the Library of Virginia Records Retention policies (section Overview of Federal and State Regulations, subsection: State Code and Regulations).

### Reporting Finances

Program managers are responsible for several quarterly or annual fiscal reports in addition to requesting reimbursements in OMEGA or by paper. The chart below provides a brief explanation of what is required and the reporting schedule. Fiscal reports should always be signed by the superintendent, executive director, or college president as a matter of internal controls and segregation of duties. All forms have detailed instructions included within the file on the first worksheet tab. Be sure to check the current Calendar of Due Dates on the [Grants and Funding](https://www.doe.virginia.gov/teaching-learning-assessment/specialized-instruction/adult-education/grants-funding) webpage for exact due dates.

**Table 3.2 Descriptions of Fiscal Reports**

| **Name of Report** | **Brief Description** | **Schedule of Submission** |
| --- | --- | --- |
| Federal Match | This form documents expenditures charged to local match, organized by locality. Local match may be cash or in-kind contributions and must be identified as one or the other category. All match must be expended within the program year. | Quarterly |
| Program Income | This form documents intake and expenditures of program income. Program income is to be spent within the quarter in which it is collected or as soon as possible. All program income must be expended within the program year. Providers that do not collect program income attest to this on the first quarter’s submission and do not need to submit further reports. | Quarterly |
| SLCA Expenditures | This form, used by school division fiscal agents, documents expenditures charged to SLCA. For fiscal agents based at school divisions that receive recurring payments, any amount left unspent at the end of the year must be returned to the VDOE unless notified otherwise. | Quarterly |
| Career and Training Services | This form documents the amount of federal instructional funds expended on activities categorized as Career and Training Services. See [Directors Memo #018-19](https://www.doe.virginia.gov/home/showpublisheddocument/35392/638054947146570000) for more information. | Annually, mid-August |
| One-Stop Infrastructure Report | This form documents the amount of federal funds contributed to the Virginia Career Works system toward infrastructure costs (non-personnel). | Annually, mid-August |

## PROGRAM MANAGEMENT AND DELIVERY

Managing your program’s resources to maximize service offerings and strategically coordinate with partners keeps your program vibrant. Consult this section for information on funding requirements and restrictions, ideas for extending your program outreach, and on being an instructional leader.

### Planning Allowable Activities by Funding Stream

This section details the allowable activities under each federal funding stream and ways to leverage the purpose of the funding to meet the state priorities and regional needs. While providers organize, report, and communicate their offerings as the four *program types* of adult basic education (ABE), adult secondary education (ASE), English language acquisition (ELA), and Integrated English Literacy and Civics Education (IELCE), the statute lists *activities* in the definition of adult education and literacy Sec. 203(2). These activities describe the kinds of instructional approaches and content to be delivered with the federal funds.

#### AEFLA Sec. 231 Adult Education Activities

In Virginia, providers are required to offer the following five activities per the Combined State Plan and the 2020-2023 State Priorities:

1. Adult education,
2. Literacy,
3. English language acquisition activities,
4. Workforce preparation activities, and
5. Integrated education and training (IET).

Providers may also offer the following three activities with Sec. 231 funds, with justification of need:

1. Integrated English literacy and civics education,
2. Workplace adult education and literacy activities, and
3. Family literacy activities.

Each of these activities is defined in the Glossary of Terms.

Note that the State Priorities should be considered part of high-quality programming, including full implementation of standards-based instruction, the concurrent delivery of workplace preparation activities with all program types, service to those with low levels of literacy, and an overarching focus on career pathways and integrated education and training.

The allowable, non-required activities in the list above (f, g, and h) give providers opportunities to design programs to serve specific needs. For example, workplace adult education and literacy activities are designed in collaboration with an employer or employee organization (labor union, trade group, association) willing to bring educational programming – any of the allowable activities – onto the worksite or for a cohort of employees in another location in order to improve the productivity of the workforce.

Family literacy, allowable only with Sec. 231 funds due to the funding requirements described below, is defined as a four-component, two-generation model that encompasses adult education, childhood education, joint parent and child literacy activities, and parenting training. This model is frequently designed to be offered in conjunction with other community and family-serving partners. This is the only activity in which non-eligible individuals (the children) may be served with AEFLA funds. The funding has unique requirements in AEFLA (Sec. 231(d)) that state that programs “shall attempt to coordinate” funding with other entities that serve children before using AEFLA funds for the child services components. Such entities could include a public school or early childhood program, Head Start, or community-based or faith-based organization. Resources on how to design and support a family literacy program can be found at the [National Center for Families Learning](https://www.familieslearning.org/) and in the VALRC-created [*From Scratch: Using AEFLA Funds to Develop a Family Literacy Program*](https://docs.google.com/document/d/1gFCUzixdbIfFji_iFDZQSwnfvBGcgCtwXIGlpiuNEeQ/edit#heading=h.4kbn91sr2mga)toolkit.

#### AEFLA Sec. 225 Corrections Education and Other Institutionalized Individuals (C&I) Activities

In Virginia, correctional education providers are required to offer, at a minimum, standards-based instructional adult education and literacy activities in correctional settings.

Providers may also offer the following activities and may do so concurrently with adult education and literacy instruction:

* Special education, as determined by the Virginia Department of Education;
* Secondary school credit;
* Integrated education and training (IET);
* Career pathways;
* Concurrent enrollment (with other WIOA partner programs);
* Peer tutoring; and
* Transition to re-entry initiative and other postrelease services with the goal of reducing recidivism (e.g., counseling or case work). Examples of allowable use of funds for transition services include: assisting incarcerated individuals to develop plans for postrelease educational program participation, assisting incarcerated individuals in identifying and applying for participation in postrelease programs, and performing direct outreach to community-based program providers on behalf of re-entering individuals.

Priority of Service Provision: The purpose of Sec. 225 funding is to support educational programs for criminal offenders in correctional institutions and other institutionalized individuals. C&I-funded activities must give priority to serving individuals who are likely to leave the correctional institution within five years of participation in the program. Such funds may not be used for costs for participation in postrelease programs or services.

The following entities qualify as a correctional institution:

* Prison
* Local or regional jail
* Reformatory
* Work farm
* Detention center
* Halfway house, community-based rehabilitation center, or any other similar institution designed for the confinement or rehabilitation of criminal offenders

Probation and parole facilities, which do not confine criminal offenders, are not considered “institutions” in the federal definition. Services provided to reentering eligible individuals at or through probation and parole facilities and partners should be funded with AEFLA Sec. 231 funds. Providers may use Sec. 225 funds for staff to conduct direct outreach to reentry and transition programming on behalf of students but should use Sec. 231 funds to provide services to individuals not confined or for staff to participate in local reentry councils and planning groups.

#### AEFLA Sec. 243 Integrated English Literacy and Civics Education (IELCE) Activities

IELCE programs funded with Sec. 243 funds must offer the following interrelated activities in each program term:

1. Literacy instruction
2. English language acquisition
3. Civics education
   * 1. Instruction on the rights and responsibilities of citizenship
     2. Instruction on civic participation
4. Integrated education and training (IET)

See a [recorded tutorial](https://youtu.be/qZNj0JS305Q) on the requirements of an IELCE program.

#### State Matching Funds

Three funding streams are awarded out of the Virginia General Assembly budget and reported as the required state match to the federal AEFLA award: the General Adult Education (GAE) fund, the State Lead Coordinating Agency (SLCA) fund, and, as of PY2022-2023, PluggedInVA fund. These funds are awarded to each of the 22 adult education regions in conjunction with the federal adult education funds. They are not competed separately. Because these funds are declared as match to the federal funds as part of a provider’s total award, their expenditure must follow the same regulations and allowable activities (Sec. 222(b)(2)).

General Adult Education (GAE) funds are to be used to address the instructional needs of eligible individuals throughout the region, particularly those eligible individuals who have low levels of literacy skills, are English language learners, or are individuals with disabilities. Allowable costs include but are not limited to instructors’ time and effort and benefits, participation in relevant professional development, instructional materials and supplies, and assessment materials and supplies.

State Lead Coordinating Agency (SLCA) administrative funds are awarded to the fiscal agent of regional providers to assist with the costs of administering adult education and C&I programs. Allowable costs include but are not limited to the regional program manager and regional staff time and effort and benefits, professional development activities, regional travel and administrative costs.

The PluggedInVA model was built as a career pathways approach to prepare adults with the education and training they need to succeed in high-demand, high-wage careers. The VDOE distributes the PluggedIn VA funds as formula awards to reach all regional providers toensure consistent, predictable funding that providers can budget toward the staffing and instructional costs of the IET model, including the provision of career coaching services.

The PluggedInVA funds are made available through the Virginia Lottery and are distributed to school divisions only. Fiscal agents at community colleges must collaborate with a school division within the region to serve as fiscal agent for the PluggedInVA funds. Since PY2022-2023, PluggedInVA funds have been claimed as state match to the federal AEFLA award. Therefore, PluggedInVA funds are no longer be available to purchase GED® vouchers for students. No program income may be collected against PluggedInVA funds.

#### Race to GED®

The purpose of the Race to GED® initiative is to contribute to the strengthening of Virginia’s workforce by increasing the number of adults completing a high school equivalency (HSE) credential. This grant is funded through proceeds from the Virginia Lottery and is allocated to regional providers currently receiving AEFLA funds, based on the same formula as the federal funds. Virginia Lottery funds may be distributed to school divisions only. Therefore, it is necessary for community college-based fiscal agents to collaborate with a school division within the region to serve as fiscal agent for the grant.

Allowable activities to increase HSE completion include the following:

* Upgrade testing centers to increase testing capacity (i.e., upgrade computer testing equipment, add more seats, additional testing sessions, and/or additional addendum testing sites);
* Purchase testing vouchers for both the practice test and operational HSE test;
* Provide additional instructional classes or supplemental academic support;
* Implement outreach activities to increase enrollment in adult education classes through the use of various outreach venues; and
* Relevant professional development as needed to meet the goals of the grant.

#### National External Diploma Program

The National External Diploma Program (NEDP) is a competency-based, applied performance assessment system leading to an Adult High School Diploma. Owned and developed by Comprehensive Adult Student Assessment Systems (CASAS), NEDP is one of the approved adult secondary completion options in Virginia for individuals 18 years of age or older and no longer enrolled in K-12 school. The VDOE works in collaboration with CASAS and the Virginia Adult Learning Resource Center (VALRC) to provide technical assistance and training support to organizations that operate NEDP programs throughout the state. The NEDP program costs may be supported with AEFLA and GAE funding.

Administered by trained local or regional adult education program staff, NEDP evaluates the reading, writing, math, digital literacy, and workforce readiness skills of participants in life and work contexts. The flexible, self-paced program requires participants to complete a series of online assignments which are tracked by time on task and may be captured as distance learning hours. The online assignments are coupled with regular virtual meetings with an advisor/assessor, and the time spent in both activities may be counted as contact hours.

Only approved NEDP agencies that have completed the required training may offer the program. Adult education providers interested in starting an NEDP should contact the High School Equivalency Specialist at the state office to schedule a preliminary consultation. New NEDP agencies must establish a formal partnership with an accredited Virginia diploma granting school division that agrees to award adult high school diplomas to NEDP graduates. See the CASAS [NEDP website](http://www.nedp.org/) for additional information on the NEDP.

#### Individual Student Alternative Education Plan

The VDOE Office of Career, Technical, and Adult Education administers the Individual Student Alternative Education Plan (ISAEP) program, a Board of Education-approved K-12 alternative option. The office provides leadership and oversight to ISAEP programs in Virginia. All Virginia public school divisions may apply annually for state lottery funding to support the ISAEP program. This program is not adult education-related programming, although adult education program managers may seek to coordinate with local ISAEP programs on HSE testing centers and other relevant issues.

In accordance with the *Code of Virginia* [§22.1-254D.E](https://law.lis.virginia.gov/vacode/title22.1/chapter14/section22.1-254/), the ISAEP program fulfills compulsory attendance requirements for students who are at least 16 years of age and for whom an ISAEP is written. With a key focus on dropout prevention, the ISAEP program provides an opportunity for qualifying students to work toward a high school equivalency (HSE) credential and participate in career and technical education (CTE) and work-based learning activities. Students must be enrolled in public education and meet program eligibility requirements. Students and parents or guardians seeking specific information about the eligibility and application process should contact the local school division.

### Managing HSE Programs

Assisting individuals to earn their secondary credential is a key responsibility of title II of WIOA and a performance metric of an adult education program. Without a secondary credential, many avenues of education, training, and employment advancement are closed to individuals. While a secondary credential alone is no longer a sufficient endpoint of education, it remains a key milestone to further achievements. This section describes the various pathways to earning a secondary credential and the considerations adult education programs must make to support HSE testing.

#### Five Ways to Earn a High School Credential

Adult education programs in Virginia have five pathways to recommend to individuals seeking a secondary credential: (1) Standard or Advanced Studies High School Diploma, (2) Adult High School Diploma, (3) General Achievement Adult High School Diploma (GAAHSD), (4) National External Diploma Program, or (5) High School Equivalency Credential. Matching the individual’s circumstances and abilities to particular options can help them reach their goals more efficiently. To compare all high school credential options, read [Five Ways to Earn a High School Credential](https://www.doe.virginia.gov/home/showpublisheddocument/34718/638053291427930000). Each adult high school completion option can also be found in the Virginia Administrative Code [8VAC20-30-20, Minimum Requirements for Adult High School Programs](https://law.lis.virginia.gov/admincode/title8/agency20/chapter30/section20/).

#### Funding HSE Testing Activities

The federal AEFLA funds may *not* be used to purchase testing vouchers or support the operation of testing centers. Instead, program managers must budget for these costs through state funds not declared as match to the federal funds, specifically Race to GED® funds. With Race to GED® funds, programs may establish testing centers (these must meet certification standards set by Pearson Vue), support testing administrators and proctors to staff the centers, and purchase testing vouchers for enrolled students. Federal funds and state funds declared for match (GAE, SLCA, and PluggedIn VA) may not be used on any of these activities. Federal funds and state matching funds may be used to purchase HSE practice tests because these are used for educational planning and as instructional materials.

This section answers some common questions about funding HSE testing activities.

**Which tests are recognized in Virginia?**Prior to January 2014, the General Educational Development (GED®) test was the only High School Equivalency (HSE) test available to those individuals who lacked a high school diploma. Beginning January 2014, three high school equivalency examinations were published. The three HSE options were: 1) High School Equivalency Test (HiSET®), published originally by the Educational Testing Service (ETS); 2) Test Assessing Secondary Completion (TASC™), published by the Data Recognition Corporation (DRC) (no longer available); and 3) the GED® test, published by the GED Testing Service® and Pearson Vue (NOTE: GED® is no longer an acronym for General Educational Development). All three tests are recognized in Virginia by employers, community colleges, and some four-year institutions; however, as of this publication, only the GED® test has been approved by the Virginia Board of Education as meeting Virginia HSE standards through June 30, 2026.

**How is the decision made to approve an HSE examination in Virginia?**Each of the two national HSE vendors has the opportunity to respond to a [Request for Application](https://www.doe.virginia.gov/teaching-learning-assessment/specialized-instruction/adult-education/high-school-equivalency-hse-credential) during an open application period every other year between October and November. In order to qualify to be an HSE test provider in Virginia, the application’s responses must meet each guideline found in the [*High School Equivalency Examination Guidelines for Virginia*](https://www.doe.virginia.gov/home/showpublisheddocument/34684/638053283850970000)approved by the Virginia Board of Education. Each year that the call for applications is held, an HSE Evaluation Committee is appointed to review the applications received and make recommendations to the VDOE. Once a test vendor is approved, the approval is valid for five years. If a test vendor is not approved during an application period, the vendor is eligible to reapply during the next open application period.

**In what formats can the GED® test be administered?** Starting on January 1, 2014, the GED® test transitioned from a paper-based format to a computer-based format. Paper-based tests are still available, but only as an approved accommodation or if requested for another legitimate reason. The test is available in English and in Spanish. Students may choose to test in either English or Spanish or may combine subtests. Students indicate the language of their choice at the time of registration for each subtest.

The GED Testing Service® (GEDTS) began online testing, as an Online Proctored (OP) format, in July 2020. The test taker is monitored by an online proctor throughout the duration of the testing session. In order to be eligible to take the OP test, the student must have passed the specific-subject GED Ready® test and scored in the ‘likely to pass’ range within the last 60 days. When advising students whether or not to choose this testing option, it is important to know your student’s strengths. Do they feel comfortable working by themselves with technology? Do they have all of the required equipment and a quiet, undisturbed environment to test at home? Do they need scratch paper when testing? The OP test does not allow any physical scratch paper on any test nor a handheld calculator for the math test. Test takers may only use the onscreen calculator, scratch pad, and whiteboard. Students may choose to take tests at an in-person testing center, by OP format, or they may combine subtest formats.

**How can teachers learn more about the HSE test and content?** Teachers and program administrators are encouraged to visit the GED® [website](http://www.GED.com) to access instructional resources such as subject area study guides, test administration guides, study recommendations, professional development opportunities, and state policies. Teachers can sign up for the free *In Session Educator Newsletter* at the bottom of any page at the ged.com website. The HSE publishers offer professional development for instructors, both online and in-person, at conferences and workshops. Sessions for HSE preparation are offered for teachers of all instructional levels at the annual Virginia Association for Adult and Continuing Education(VAACE) Conference. There is also a national conference held each year when instructors and state administrators convene to learn information first-hand from the HSE provider.

The GED® test content is closely aligned with the College and Career Readiness Standards for Adult Education. This [resource](https://dws.arkansas.gov/wp-content/uploads/crosswalk-ged-alignment.pdf) shows a crosswalk between the CCRS and the GED® test.

**How are tests funded?**Currently, the GED® test includes four subjects, presented as separate exams. As of July 1, 2023, the cost of in-person testing per subject is $36. This includes $26 which goes to GEDTS and Pearson and $10 compensation for the testing center. Currently, the GEDTS allows two free retakes (if taken within 12 months of the initial attempt), if needed, but the examinee must pay the $10 testing center fee for each of these two retakes. The $10 testing center fee helps the testing center offset operational costs, but additional funding is needed to operate a testing center. Programs may use Race to GED® funds to supplement testing center operation and staffing costs. The cost of the Online Proctored test is $36 for initial testing and retakes. The testing center receives no funds when a student chooses to take the OP test.

Virginia promotes testing by providing vouchers for free HSE testing for enrolled adult education students meeting requirements such as passing the GED Ready® official practice test. This incentive is promoted locally by programs and on the GED® website. Race to GED® and local funds such as the Tobacco Region Revitalization Commission funds may be used to purchase these vouchers.

In 2020, the GED® communications team provided graphics and messaging for this offer that students see when setting up their GED® accounts. When a GED® account is established indicating Virginia as the jurisdiction, this banner and message is displayed stating that individuals may earn a free testing voucher if they meet three requirements:



* Enroll in an adult education program (which may include distance education options),
* Participate in and complete at least 12 hours in an adult education program, and
* Pass the GED Ready® official practice test for the GED® Content Area test (score ‘Green’) for which a voucher is needed to test.

A new campaign began in February 2022 entitled, “Just 1 to Go,” targeting those individuals who have only one test remaining to take and pass to earn a high school equivalency credential. The VALRC developed a [toolkit](https://drive.google.com/drive/folders/1u9zMossBkN-JJELFp-DTcBtGOlgnPAnb) for use by the field that includes the campaign logo, graphic files, and email and social media messages. This is an ongoing campaign to encourage Virginia test takers to return to adult education and complete their HSE testing.

**How do students receive their HSE certificate?**When individuals successfully complete the GED® test, they receive a congratulatory email that includes an electronic copy of the test transcript and information about requesting a free paper copy of the test transcript and HSE certificate. Prior to January 2014, the HSE certificate was automatically mailed to the graduate, but now the graduate must request it.

The VDOE no longer provides duplicate copies of HSE transcripts or certificates but instead uses the Parchment credentialing service. If test takers need a duplicate copy of their HSE credentials for postsecondary institutions or employers, they should go to the GED® [website](http://www.GED.com), select “Grads and Transcripts,” and follow the steps indicated. Users may order an electronic copy and/or a paper copy and have the credential sent to their requested recipient. There is a charge of $15 per item. Third party entities requesting a GED® transcript on behalf of a graduate should also follow the above process; however, they must select “Third Parties” on the ged.com website.

**Can adult education programs serve underage students?** Students who are under the age of 18 and are not enrolled in an ISAEP program must meet one of Virginia's eligibility requirements for underage GED® testing. [Superintendent’s Memo #010-17](https://www.doe.virginia.gov/home/showpublisheddocument/3974/638005119794770000), *High School Equivalency Testing*, as well as the *Code of Virginia*§22.1-254.2, which addresses all eligibility categories and the documentation required for underage testing. It is the responsibility of the parent/legal guardian to consult with the local school division and/or the courts, as appropriate, to secure the required documentation needed for underage GED® testing. Upon receipt, the adult education program must maintain the documentation in the student’s file. In addition, this documentation must be sent to the state office at GEDinfo@doe.virginia.gov so that the age alert in the student’s ged.com account may be removed.

**Can adult education programs prepare students for the Spanish language GED® test?** AEFLA and state funds may be used to offer HSE preparation instruction in Spanish in order to accelerate Spanish-speaking students’ credential attainment and improve their English language proficiency. Students may choose to test and earn the GED® credential in either English or Spanish, or they may combine subtests. Students indicate the language of their choice at the time of registration for each subtest. Adult education programs should ensure students can continue to pursue English language acquisition instruction through sequenced or coordinated class schedules or through bilingual instruction. Programs are also allowed to use AEFLA and state funds to purchase instructional materials in students’ native languages for self-study and advancement.

### Being an Instructional Leader

Program managers make decisions about scheduling, professional development, and instructional materials that have an enormous impact on how services are provided for students and how teachers manage instruction. The 13 federal considerations of adult education programming include key elements that are considered indicators of quality adult education. The considerations are provided in full in the section Competing for the AEFLA Funding and are referenced below in the recommendations for program design planning and instructor and/or staff support. Virginia’s state priorities, provided in full in the same section, are also referenced here in support of the federal considerations.

#### Designing High-Quality Programming

This section poses guided questions about programming decisions and provides links to key resources for leading high-quality instruction.

*Are classes offered with “sufficient intensity and quality”* (consideration 5a) *within “flexible schedules”* (consideration 11)such that students can engage with the content enough time per week to *“achieve substantial learning gains”* (consideration 5a)? Generally speaking, students need more than four hours per week of dedicated instructional time – this can be a combination of synchronous and asynchronous instruction. Consider how distance and blended learning can be used to address both considerations.

Evaluate your program’s enrollment patterns. Is enrollment steady enough to support managed enrollment such that a cohort of students is provided intense instruction in a determined sequence? If enrollment is ongoing through the year, can it support a modified, managed enrollment system that allows for new students to be admitted on a predetermined schedule? Additionally, determine if enrollment supports leveled classes or multi-level classes. These different models require coordination of resources and instructional support. Avoiding disruptive attendance patterns and thoughtfully grouping students will assist instructors and students alike in focusing on intentionally planned, standards-based instruction.

Does the program effectively implement differentiated instruction (DI) to engage learners to *“achieve substantial learning gains”* (consideration 5a)*?* DI is a proven instructional practice for achieving learning gains with diverse groups of adult learners. The Teaching Excellence in Adult Literacy (TEAL) project [defined DI](https://lincs.ed.gov/sites/default/files/5_TEAL_Differentiated_Instruct.pdf) as “the planning and delivery of classroom instruction that considers the varied levels of readiness, learning needs, and interests of each learner in the class.” Instructors enact DI through flexibility in instructional approaches and through variety in classroom routines, assignment types, learner groupings, and options for evaluating mastery of content. Instructional leaders should be asking several questions of local leaders and teachers. Do program intake and scheduling processes, physical environments, and technology tools facilitate learner collaboration and DI? Do instructors modify their teaching based on individual learners' interests, readiness, and goals? Do learners have choices in the topics they study, the materials they use, or how they demonstrate learning? Does instruction incorporate a variety of learner groupings, including time for learners to work individually as well as collaboratively with peers at a similar level? Do instructors provide scaffolding for learners who need additional support and extension opportunities so learners who have completed a task remain challenged? Does instruction make use of strategies like learning stations, flexible grouping, tiered activities, project-based learning, pre-assessments, and formative assessment that support DI? Do instructors have planning time to review learner data and plan differentiated activities?

*Does the program use technology effectively* (consideration 7)? What technology resources are available for teaching and learning in classrooms and for homework or distance learning? What is the plan for increasing online learning options? Is the same level of technology available in all classes in the region? How are teachers supported to expand their technology skills? How is the program addressing equitable access to these resources for students across the community (e.g., through an equipment lending library or community partners)?

The[*Assessment and Distance Education Policy for Virginia Adult Education and Literacy Programs*](https://www.doe.virginia.gov/teaching-learning-assessment/specialized-instruction/adult-education/program-policy-guidance) states: distance education is a way to increase services to adult learners in Virginia and a means to improve the state’s adult education outcomes. It is also a method of increasing access to educational resources for the state adult student population as well as building capacity to serve more students with a wider variety of delivery options. Distance education’s incorporation of technology affords students who are not able or choose not to attend traditional classes another avenue to further their education and improve their skills.

[Distance education resources](https://valrc.org/?s=distance+education) can be found on the VALRC’s website. Resources include:

* + - * [*Approved Curriculum List*](https://valrc.org/resource/approved-distance-education-curricula/) - Distance education curricula are reviewed and approved by a Distance Education Curriculum Review Panel. The list of approved distance education curricula is maintained and disseminated by the VALRC.
      * [*Distance Education Curriculum Submission Form*](https://valrc.org/resource/distance-education-curriculum-submission-form/) - Local and regional program managers can submit recommended curricula to the Distance Education Curriculum Review Panel using this form.
      * [*Assessment Policy and Distance Education Policy for Virginia Adult Education and Literacy Programs*](https://www.doe.virginia.gov/teaching-learning-assessment/specialized-instruction/adult-education/program-policy-guidance)- This policy document defines distance education for adult education programs in Virginia and provides guidelines by which programs can report adult learners’ distance education hours.
      * [*Distance Education Introduction Video*](https://valrc.org/resource/distance-education-introduction-video/) - This video, based on information provided in the *IDEAL Consortium Handbook,* presents a common language of distance education definitions and terms.
      * [*Distance Education Webinar Series*](https://valrc.org/resource/distance-education-webinar-series/) - This two-part webinar series, hosted by the VALRC, provides guidance and recommendations for establishing quality, innovative distance education and blended learning programs. Topics of discussion include common definitions of distance education terminology, blended learning models, successfully implemented distance education and blended learning programs from different states, and key findings from IDEAL Consortium research.
* [Quality Teaching Online Resources and Tips](https://valrc.org/quality-teaching-online-resources-and-tips/) - These curated resources and tip collections provide guidance to support programs and instructors in implementing quality teaching online.
* [*Transforming Distance Education Course*](https://edtech.worlded.org/transforming-distance-education/) by EdTech Center@ World Education - This course is designed for education providers and practitioners teaching adult basic academic skills, English for speakers of other languages (ESOL), and literacy at a distance and/or through blended learning. It provides strategies and resources that are essential for both setting up and implementing distance education or teaching with a blended approach.

*Do the instructional methods and materials reflect the essential components of reading instruction* (consideration 5b) *and “best practices derived from the most rigorous research available”* (consideration 6)? How does the program evaluate, choose, and renew instructional materials that support standards-based instruction to adhere to the state priority to deliver standards-based instruction (SBI) in all settings? How does the program incorporate all components of reading (alphabetics, fluency, vocabulary, and comprehension) and the science of reading instructional methods into programming? Are learners who read at or below the intermediate level assessed to determine which reading component skills they need to strengthen? How do staff recruitment, hiring, retention, and development practices ensure content knowledge expertise is maintained and updated among instructors and support communication between managers and instructional leaders?

The [*College and Career Readiness Standards for Adult Education (CCRS)*](https://lincs.ed.gov/publications/pdf/CCRStandardsAdultEd.pdf) are Virginia’s state-adopted standards for adult education instruction. For ESOL instruction and other classes that include English language learners, teachers are encouraged to consult and use the [*English Language Proficiency Standards (ELPS)*](https://lincs.ed.gov/publications/pdf/elp-standards-adult-ed.pdf), which provide standards and guidance for supporting language learners in reaching college and career readiness goals. Programs are expected to fully implement SBI, which is defined by the state as:

*All adult education programs are prepared to deliver instruction aligned to and addressing all levels of state-adopted instructional standards. Standards-based instruction demonstrates College and Career Readiness key advances and meets the expectations set by the core actions of the Standards-in-Action observation tools. Organizational leadership, policies, and practices support the conditions necessary for the effective and sustainable implementation of standards-based instruction to maximize student learning in adult education classrooms across the Commonwealth.*

The [*Implementing Standards-based Instruction in Virginia: A Technical Assistance Roadmap*](https://valrc.org/standards-based-instruction/) document includes more information on the standards, key advances, and core actions, along with suggestions for how managers and teachers can support SBI. Programs embracing full implementation of SBI address the breadth of skills included in the CCRS, among them critical thinking, quantitative reasoning, digital literacy, collaboration, and speaking and listening for all adult learners. The VALRC offers an abundance of [training and resources related to SBI](https://valrc.org/standards-based-instruction/).

*How is adult education and literacy instruction contextualized* (consideration 8), such that learners are simultaneously preparing for further education and training, employment, or work advancement? Workforce preparation activities can be a powerful means of contextualizing academic instruction. Integrated education and training (IET) programming, through which academic, workforce preparation, and occupational training are offered concurrently, is also a programming model that allows instructors to contextualize instruction and, as a state requirement, should be offered by every provider.

*What is the level of communication and coordination between the program and the Local Workforce Development Board (LWDB), the local and regional one-stop centers, and other community organizations and services in the development of career pathways* (consideration 10)? It is important to recognize and understand the role of adult education in the local and regional workforce continuum. Is the program responsive to the needs identified in the local workforce development plan (consideration 1a)? Do program activities and services align with the strategies and goals of the local plan, and are these services offered in collaboration with the WIOA and community partners (consideration 4)? Is the program fulfilling its responsibilities with the local and regional Career Works Centers (section Alignment with WIOA Partners, subsection: One-Stop, or Career Works, Center Responsibilities)?

*Is the program design responsive to serving individuals in the region who are most in need of adult education and literacy activities, including individuals who have low levels of literacy or are English language learners* (consideration 1b and 13)? How is the program using data to track “responsiveness”? How are partnerships leveraged to reach key populations for services? See the interactive [Study of Adult Skills maps](https://nces.ed.gov/surveys/piaac/skillsmap/) that are constructed at the county level to inform your understanding of local needs.

#### Serving Adults with Disabilities

Federal consideration 2 asks *how well programs and instructors are prepared to serve students with disabilities and students who face other barriers.* Youth and adults with disabilities, whether formally diagnosed or not, with either high-incidence (such as learning disabilities, attention disorders, and health impairments) or low-incidence (such as severe sensory impairments) disabilities, or both, are populations of high priority for WIOA services. Instructors and support staff should be knowledgeable about how to communicate with individuals about disabilities and about the program’s policies governing confidentiality and the provision of reasonable accommodations. Students should be served in the most integrated setting appropriate.

WIOA describes funded providers’ obligation to serve individuals with disabilities and other protected statuses in Section 188, which presents the nondiscrimination and equal opportunity provisions for workforce services, activities, and programs. Sec. 188 of WIOA prohibits discrimination on the basis of race, color, religion, sex, sexual orientation, age, disability, political affiliation or belief, national origin (including limited English proficiency), and citizenship status. The regulations for implementing Sec. 188 can be found in [29 CFR Part 38](https://www.govinfo.gov/content/pkg/CFR-2018-title29-vol1/xml/CFR-2018-title29-vol1-part38.xml).The LEAD Center, a technical assistance contractor for the U.S. Department of Labor, created the [*Section 188 Guide, Promising Practices in Achieving Nondiscrimination and Equal Opportunity: A Section 188 Disability Reference Guide*.](https://www.dol.gov/agencies/oasam/centers-offices/civil-rights-center/statutes/section-188-workforce-innovation-opportunity-act/guide) The Guide is organized into two major content areas, Part I: Best Practices and Part II: The Regulations.

The following topics highlight some of the promising practices from the Guide with language directly excerpted from it. Program managers are encouraged to download the entire Guide and use it for staff training in conjunction with trainings offered by the statewide Accessibility Task Force (section Alignment with WIOA Partners, subsection: Cross-Agency Projects).

**Marketing and Outreach.** Outreach materials [should] mention individuals with disabilities as one of the groups served, contain positive images of individuals with disabilities, and indicate a commitment to…effectively serve individuals with disabilities (Section 1.2, p. 9-12).

**Registration.** Program staff asks all registrants (including individuals with disabilities) whether they need assistance during the application/registration process…and offer assistance to all individuals, including individuals with disabilities, in filling out forms and application materials. If a person needs assistance, this process is done one-on-one in a private room where the individual’s responses will not be overheard. All customers are routinely offered the option of meeting with staff in private offices (Section 1.6.2, p. 17).

**Confidentiality and Disclosure.** Programs [should] develop written policies for staff regarding the legal requirements related to discussion and disclosure of a customer’s disability and provide training to staff regarding the applicability of these requirements and policies. For example, the policy [should] explain that intake workers 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 is made clear that disclosure is voluntary and information regarding disability will be kept confidential and maintained in a separate file (Section 1.6.4, p. 18).

**Collaboration with Partners.** Steps are taken by…programs to improve operational collaboration and communication (e.g., conduct surveys on how entities could more effectively work together and establish partnerships and linkages through open and ongoing discussions and memoranda of understanding or other mechanisms) with entities that have experience working with individuals with disabilities to enhance capacity to effectively serve individuals with disabilities and to ensure equal opportunity and nondiscrimination (Section 1.4, p. 13-14).

**Accommodations.** Programs are required to provide reasonable accommodations for individuals with disabilities to ensure equal access and opportunity. In general, a reasonable accommodation is a modification or adjustment in the way the program is administered that enables an individual with a disability to receive any aid, benefit, service, training, or employment equal to those provided to individuals without disabilities.

Many forms of reasonable accommodations are available, and the individual with a disability and the program should work together to identify the most effective, reasonable accommodation for each individual…. The process of identifying and providing a reasonable accommodation should be done as quickly as possible to avoid delaying access to services. Establishing and implementing an effective process for requesting, identifying, and providing a reasonable accommodation effectively and efficiently are essential to ensuring equal opportunity for individuals with disabilities (Section 2.2, p. 32-33).

**Accessibility, both physical and programmatic.** Noqualified individual with a disability may be subjected to discrimination because a [program’s] facilities are physically inaccessible to or unusable by individuals with disabilities (Section 2.7, p. 43).

“Programmatic accessibility” includes providing reasonable accommodations for individuals with disabilities; making reasonable modifications to policies, practices, and procedures; administering programs in the most integrated setting appropriate; communicating with persons with disabilities as effectively as with others; and providing appropriate auxiliary aids or services, including assistive technology devices and services, where necessary to afford individuals with disabilities an equal opportunity to participate in and enjoy the benefits of the program or activity (definition at 29 CFR 38.13(b) 3).

The VALRC has curated a [suite of resources](https://valrc.org/resources/?_sft_resource_topic=disabilities) that can assist programs and instructors when working with learners with disabilities. These include self-paced and facilitated courses, links to national resources such as the [Job Accommodation Network](https://askjan.org/), and the ten WIOA [Disability Playlists](https://disability.workforcegps.org/resources/2017/02/15/22/14/The_Playlists_Disability_Resources_for_WIOA_Practitioners) and articles on strategies and helpful tools.

A particularly helpful concept for increasing inclusive teaching and learning is Universal Design for Learning (UDL). This is a framework to remove barriers from curriculum and instruction and make learning more inclusive for all students. This flexible approach provides multiple ways for learners to access and engage with course content and expectations. More information about how adult educators can apply UDL can be found on the [Inclusive Virginia](https://www.inclusive.valrc.org/supports-2/universal-design-for-learning/) website and through technical assistance from the VALRC.

#### Supporting Instructors and Student Services Staff

Federal consideration 9 asks *how instructors, counselors, and administrators are selected and provided access to high-quality professional development*.Ensuring that these student-serving staff members have the skills they need to implement a high-quality program requires thoughtful onboarding, organizational structures, regular communications and faculty meetings with administrators, and ongoing professional development and feedback.

In Virginia, the minimum education requirement for adult education instructors is to hold a Bachelor’s degree. Some programs require instructors to hold teaching licenses; others require newly hired instructors to complete a minimum sequence of professional development offered through the VALRC. Onboarding new staff members and ensuring that they all are kept up to date with state and program requirements take deliberate planning and communication. Does your program have an instructors’ handbook; if so, how often is it reviewed and updated? Does your program conduct an onboarding orientation for new instructors? How do you support teachers through their first semester or year?

The VALRC and the state office are sources of professional development for instructional and administrative staff, and although there is no minimum state requirement for the number of hours of professional development required each year, programs budget annually for participation in professional development and involvement in professional learning communities (PLC).

Reimbursement to staff members for participation in professional development is an allowable use of federal funds and must be budgeted in the administrative portion of the federal budget (section Managing Federal and State Budgets, subsection: Establishing Budgets). The federal funds in this category are quite limited. Other sources of funding for professional development are the GAE funds, Race to GED® funds, PluggedIn VA funds, local matching funds, program income, and, in some cases, State Lead Coordinating Agency funds (SLCA). The SLCA funding is an appropriate source in instances when a lead staff member attends a conference with the expectation of sharing the training content with the region upon return.

The PLCs are another mechanism to build staff expertise and support continuous program improvement. They bring educators together for regular, collaborative meetings over an extended period of time (usually a few months or a year) in order to address a problem, plan, and/or improve their craft. The elements of PLCs are to:

1. leverage existing professional wisdom among participating educators;
2. examine additional, external knowledge sources (such as information on evidence-based practices, examples of student work, or student assessment data); and
3. identify practical implementation efforts by group members during the course of the PLC.

The PLCs often use a protocol such as that provided by the [critical friends model](https://www.paadultedresources.org/wp-content/uploads/2016/10/Overview-of-Critical-Friends-Model-12-13-17.pdf) to ensure meetings are organized and productive.

When instructors and staff members are planning and learning together to address local and regional issues, their participation may be categorized as a PLC for budgeting purposes. The PLCs may be budgeted under federal instructional funds, GAE, Race to GED®, PluggedIn VA, local match, and program income. In some cases, the VALRC coordinates statewide PLCs so that participants can work together on common local issues. Be sure to check with the state office before budgeting for a statewide PLC to determine whether it should be categorized to instructional or administrative funds, if using federal funds.

Instructors should be evaluated and observed by peers and/or administrators so that they are receiving regular and timely feedback. While formal evaluation of instructors may be a responsibility assigned by the employing school division, class observations are an opportunity to focus on instructional delivery of SBI. See VALRC [resources for supporting standards-based instruction](https://valrc.org/standards-based-instruction/) to find the CCR Observation Tools and a recorded tutorial on how to use them.

### Growing and Sustaining Your Program

This section has links and tips for growing and sustaining your adult education program. Whether a program is located in a dense urban area, a sparsely populated rural area, or a region with a combination of areas, program managers have the responsibility of maintaining the vibrancy and vitality of the program’s communications, the reach of program offerings to all localities, and its health as an organization.

#### Communications and Outreach

Providers may use federal funds (when necessary and costs are prudent) and Race to GED® funds for outreach and communication materials and subscriptions. Creating clear and attractive messaging to reach your focus audience is key,and doing that is both an art and a science. You may want to seek communication partners who have experience in reaching underserved and/or language minority populations in your communities to find ways to get your brand and messaging to eligible participants. Coordinating and working together with community partners, with reciprocal agreements on outreach venues and expectations, can greatly expand the “reach” of your outreach. For example, the VDOE worked with the GED® Testing Service to create messaging that appears on the GED.com [website](http://www.GED.com) when a user selects Virginia as his or her testing jurisdiction.

An Outreach Plan that includes activities designed specifically for an identified audience, such as immigrant and refugee populations, disconnected youth, or underemployed workers can guide programs in their efforts and evaluation of those efforts Outreach efforts are planned activities that serve to inform and engage not only prospective adult education students but also their family members, employers, WIOA partners, community agencies, and other internal and external stakeholders. One activity might be to check GEDPrep Connect™ regularly for prospective students who have indicated interest in learning more about adult education programs. Designating or hiring a staff member to serve as an outreach specialist may be helpful, especially in the larger urban programs. Outreach and engagement activities may occur in various venues and should be evaluated in terms of their return on investment. If a particular outreach activity does not produce the expected outcomes, then the plan should be readjusted.

Every adult education region should identify its own branding. If you have a regional logo or if you use the Virginia Career Works branding for your workforce development area, be consistent in the use of these so that your program will be easily identified with the logo seen in your outreach materials.

#### Retention and Persistence

Ensuring students can reach their goals is key to running an excellent program. How students are supported and encouraged, from their first encounter with the program’s branding and outreach message through to their goal attainment, is a responsibility that can and should be shared with and addressed by community partners who share similar missions. Many of the program activities in this section are considered “career services” that WIOA programs offer clients. See more about career services in [Director’s Memo #018-19](https://www.doe.virginia.gov/home/showpublisheddocument/35392/638054947146570000).

**Intake**. When a person first enters an adult education program, an Adult Student Profile Document (ASPD) is completed. This begins the process of gathering background information from prospective adult education students about their educational and work histories, their current skills, their educational goals, and any barriers they face in achieving those goals. This information will drive the student’s program plan.

The VDOE has provided the first (student-facing) page of the ASPD in a wide variety of languages to ease intake for speakers of other languages. See the forms on the [Grants and Funding](https://www.doe.virginia.gov/teaching-learning-assessment/specialized-instruction/adult-education/grants-funding) page. The VALRC has produced [mini videos](https://valrc.org/resource/multilingual-aspd-videos/) in a similar variety of languages to explain the intake process. Make use of these resources to put language learners at ease.

During the intake process (within the first six hours), an assessment is conducted through standardized pre-testing and/or a variety of informal assessments that the adult education staff may want to administer to obtain further information on students’ needs and interests. Both standardized and informal (non-standardized) testing provide valuable information when planning the learner’s course of study. Both the ASPD and assessments are covered in more depth in the Performance Accountability section, subsection: Being a Data and Assessment Leader.

**Orientation**. Orientation is the introduction of the student to the adult education program. It helps students feel welcome and more comfortable within the program by providing a program overview, an introduction of staff, and an opportunity to meet fellow classmates. Warmth, friendliness, and concern for the student, along with seriousness of purpose and an explanation of the reasons for intake procedures and assessments, are some of the messages that should be communicated to the adult learner during this session, whether it is in person or a recorded video shared with new students. The students should come away from this orientation session with enough information about the program to understand the commitments they will need to make to reach their goals. Having students engage in goal setting from the beginning of their commitment may aid in persistence and retention. Providing a program information packet to students can also be helpful and informative.

**Persistence**. Persistence refers to the perseverance of students, which can be a challenge for those returning to adult education while balancing many other adult responsibilities. Staying with the program and engaging in self-study are critical determinants of whether or not students’ educational and workforce goals are likely to be met. Programs can contribute to a student’s sense of determination and persistence to continue to work toward their goals and return when they are able to attend. To more fully understand the issues surrounding the persistence of students, refer to the research study on [Critiquing Adult Participation in Education](http://researchallies.org/services/critiquing-adult-participation-in-education-cape/) (the “CAPE” study).

**Referrals and Support Services.** In many instances, students benefit from referrals to other service agencies, either to co-enroll in other WIOA title programs, or to access support services such as health care and legal services, or assistance with transportation, housing, food, or child care. See the Glossary of Terms for the full list of support services authorized under WIOA. One way to facilitate referrals is through the [Virginia Career Works Referral Portal](https://va-career-works.myjourney.com/). This web- and mobile-based platform allows individuals to request referrals to programs that can assist them in advancing their career paths and financial independence through training, certification, and education and employment services. Assisting adult education students to access these additional support services and programs may help address participation and persistence barriers. Program managers and career navigators or coaching staff should stay in close communication with their local area [Virginia Career Works Center](https://virginiacareerworks.com/) and Workforce Development Board(s) to stay informed about opportunities for youth programs, student supports, veterans’ services, and services for individuals with disabilities.

Partner programs are excellent sources of referrals toyour program as well. You may receive referrals of individuals who enter information into the Referral Portal requesting educational services. These may come from your Career Works Center partners or from VALRC’s helpdesk, which monitors the Referral Portal. Also, remember to reach out to community partners to strategize effective outreach efforts and specific services to shared populations. For example, be sure all service providers serving reentering citizens transitioning from correctional institutions are connecting those clients with limited education and/or those with a need for skills development to your services and reach this population by arranging services to be offered at transition programs like probation and parole offices. Faith-based groups can also be partners to help reach specific community groups and speakers of other languages; they may be able to provide recruitment and supportive services as a trusted voice in the community.

#### Collaborating and Leveraging Funding Opportunities

In Virginia, adult education providers may seek additional funding that enhances their ability to offer programming and services that attract, support, and retain students so that they can achieve their goals. Additional funding sources often have different spending allowances that can fill gaps left by the AEFLA allowability rules. For example, while federal and state matching dollars may not be used to fund student tuition unless it is part of an official IET cohort, partners such as WIOA title I and the Department of Social Services (DSS) may support tuition stipends for shared clients. Similarly, while federal and state matching funds may not be used to purchase supplies for celebrations, local business sponsors are often happy to help and be a part of recognition and sponsorship activities. One key financial principle to keep in mind as you seek additional funds, however, is “supplement not supplant” (Overview of Federal and State Regulations, subsection: Federal Legislation and Regulations).

While adult education providers may not be an eligible or the most appropriate applicant for these funding streams, applying with a local partner may generate funds that can strengthen joint programming and outreach in your community. The following list provides a few sources of additional funds:

* Road to Success in Virginia (RSVP): The Department of Social Services sponsors grants to community colleges and adult education partners under the Temporary Aid for Needy Families (TANF) federal funds. These grants, competed by the VCCS, specifically require integrated education and training programming.
* Local Workforce Development Boards (LWDB): Although the Boards do not usually have discretionary funds, they may be an eligible applicant for state discretionary grants that fund education and training, professional development, or related projects.
* [Dollar General Adult Literacy Fund](https://www.dgliteracy.org/grant-programs/)
* [The Virginia Foundation for Community College Education](https://vfcce.org/).
* [United Way chapters](https://www.unitedway.org/local/united-states/virginia).
* [Dress for Success](https://dressforsuccess.org/).

A curated list of grant opportunities is kept current at the ProLiteracy [website](https://proliteracy.org/Resources/Grants-Funding).

### Competing for the AEFLA Funding

AEFLA grants are competed by the VDOE on a three-year cycle, most recently in 2023 for the 2023-2025 cycle. Every second and third year, providers must submit a continuation application. Federal funding levels fluctuate each year in response to the federal allocation. State funding levels are more consistent year over year. Budget workbooks and narratives are required in each year’s application. Regional adult education (Sec. 231) funds are awarded to a single fiscal agent for each region. C&I (Sec. 225) funds are awarded to eligible providers applying to serve institutionalized individuals within cooperating facilities. IELCE (Sec. 243) funds are awarded to eligible providers applying to serve localities with demonstrated need for services, whether across an entire region or in a locality.

#### Eligible Providers

An eligible provider is an organization that has demonstrated effectiveness in providing adult education and literacy activities. These organizations may include, but are not limited to:

(a) local educational agency;

(b) community-based organization or faith-based organization;

(c) volunteer literacy organization;

(d) institution of higher education;

(e) public or private nonprofit agency;

(f) library;

(g) public housing authority;

(h) nonprofit institution that is not described in (a) through (g) and has the ability to provide adult education and literacy activities to eligible individuals;

(i) consortium or coalition of the agencies, organizations, institutions, libraries, or authorities described in (a) through (h); and

(j) partnership between an employer and an entity described in (a) through (i).

A consortium may be led by a single fiscal agent, but represents a coalition of eligible providers, each of whom must be able to demonstrate effectiveness. The regional structure in Virginia that represents investment and involvement by local school divisions, literacy organizations, and other providers under a single fiscal agent are considered consortiums. Each member of a consortium must itself be an eligible provider and demonstrate effectiveness (see below).

#### Eligibility Determination

Applications are screened to ensure they have met the minimum technical requirements enumerated below and, if so, eligible for further evaluation:

1. The application was submitted by an eligible provider.
2. The application was received by the submission deadline.
3. The application was submitted in the required format with all required information.
4. The application included original signatures.
5. The application included required documentation of demonstrated effectiveness by the eligible provider illustrating service to eligible individuals. If the application was submitted by a consortium of providers (see Glossary of Terms), *each* member of the consortium must have submitted the required documentation to demonstrate that it meets or exceeds the acceptable level of performance.

Applications that do not meet these minimal technical requirements are not advanced for further evaluation.

#### Demonstrated Effectiveness

Demonstrated effectiveness is a screening process to determine eligibility for review. Only applications that provide documentation of demonstrated effectiveness that meets or exceeds the state-set performance levels in providing effective adult education and literacy services will be evaluated for eligibility for AEFLA funds. This screening process ensures that eligible providers, including all member providers of a consortium, are experienced and effective in serving the academic and workforce development needs of the adult education population. The state establishes the reporting expectations for this requirement and publishes it with the grant application package. Each member of a consortium must submit the required documentation within the fiscal agent’s (the primary submitter) application to demonstrate that it meets or exceeds the acceptable level of performance.

#### Grant Review Processes

Once it has been determined that the applicant has sufficiently demonstrated effectiveness in providing adult education and literacy activities, the application is forwarded for review. The LWDB(s) associated with the applicant’s adult education region are responsible for evaluating the extent to which the eligible provider’s proposed activities are aligned with the education and training activities identified in the LWDB’s current local plan. All title II adult education applications (i.e., adult education, C&I, and IELCE) are required to be aligned with all the local planswithin the adult education region*.* If more than one LWDB is located within an adult education region, the adult education application is reviewed for alignment by both boards.The scores and feedback by the LWDB review are taken into account in the final evaluation of applications.

Grant review panels evaluate sets of applications and are composed of adult education content experts and agency partners from across the state. Applications are evaluated by reviewers on the extent to which the application addresses the seven federal requirements and the thirteen federal considerations (see below). Panelists review each assigned application independently and submit scores and feedback ahead of a panel meeting during which panelists discuss their assigned scores and any scoring discrepancies and establish a consensus or team score.

Funding decisions are ultimately made by the VDOE, Office of Career, Technical, and Adult Education, based on the review panel’s recommendations.

#### Federal Requirements and Considerations

State adult education staff constructs the application package and evaluation rubric and overall process to address the federal requirements and considerations that apply to competing AEFLA funds and ensures that funded providers are in compliance with the law and regulations. These requirements and considerations are found in Sec. 231 of AEFLA.

The seven requirements are:

1. A description of how funds awarded under this title will be spent consistent with the requirements of title II of AEFLA;
2. A description of any cooperative arrangements the eligible provider has with other agencies, institutions, or organizations for the delivery of adult education and literacy activities;
3. A description of how the eligible provider will provide services in alignment with the local workforce development plan, including how such provider will promote concurrent enrollment in programs and activities under title I, as appropriate;
4. A description of how the eligible provider will meet the state-adjusted levels of performance for the primary indicators of performance identified in the State’s Unified or Combined State Plan, including how such provider will collect data to report on such performance indicators;
5. A description of how the eligible provider will fulfill, as appropriate, required one-stop partner responsibilities (section Alignment with WIOA Partners, subsection: One-Stop, or Career Works, Center Responsibilities);
6. A description of how the eligible provider will provide services in a manner that meets the needs of eligible individuals; and
7. Information that addresses the following 13 considerations.

The 13 considerations are:

1. The degree to which the eligible provider would be responsive to:
   1. Regional needs as identified in the local workforce development plan; and
   2. Serving individuals in the community who were identified in such plan as most in need of adult education and literacy activities, including individuals who--
      * 1. Have low levels of literacy skills; or
        2. Are English language learners;

2. The ability of the eligible provider to serve eligible individuals with disabilities, including eligible individuals with learning disabilities;

1. The past effectiveness of the eligible provider in improving the literacy of eligible individuals, especially those individuals who have low levels of literacy, and the degree to which those improvements contribute to the eligible agency meeting its state-adjusted levels of performance for the primary indicators of performance;
2. The extent to which the eligible provider demonstrates alignment between proposed activities and services and the strategy and goals of the local plan under section 108 of the Act, as well as the activities and services of the one-stop partners;

5. Whether the eligible provider’s program

(a) is of sufficient intensity and quality, and based on the most rigorous research available so that participants achieve substantial learning gains and

(b) uses instructional practices that include the essential components of reading instruction;

6. Whether the eligible provider’s activities, including whether reading, writing, speaking, mathematics, and English language acquisition instruction delivered by the eligible provider, are based on the best practices derived from the most rigorous research available, including scientifically valid research and effective educational practice;

7. Whether the eligible provider’s activities effectively use technology, services and delivery systems, including distance education, in a manner sufficient to increase the amount and quality of learning, and how such technology, services, and systems lead to improved performance;

8. Whether the eligible provider’s activities provide learning in context, including through integrated education and training, so that an individual acquires the skills needed to transition to and complete postsecondary education and training programs, obtain and advance in employment leading to economic self-sufficiency, and to exercise the rights and responsibilities of citizenship;

9. Whether the eligible provider’s activities are delivered by well-trained instructors, counselors, and administrators who meet any minimum qualifications established by the state, where applicable, and who have access to high-quality professional development, including through electronic means;

10. Whether the eligible provider coordinates with other available education, training, and social service resources in the community, such as by establishing strong links with elementary schools and secondary schools, postsecondary educational institutions, institutions of higher education, local WDBs, one-stop centers, job training programs, and social service agencies, business, industry, labor organizations, community-based organizations, nonprofit organizations, and intermediaries, in the development of career pathways;

11. Whether the eligible provider’s activities offer the flexible schedules and coordination with federal, state, and local support services (such as child care, transportation, mental health services, and career planning) that are necessary to enable individuals, including individuals with disabilities or other special needs, to attend and complete programs;

12. Whether the eligible provider maintains a high-quality information management system that has the capacity to report measurable participant outcomes (consistent with section 116) and to monitor program performance; and

13. Whether the local area in which the eligible provider is located has a demonstrated need for additional English language acquisition programs and civics education programs.

#### Continuation Applications

Leading into the second and third years of a three-year cycle, providers are required to submit to the VDOE a continuation application with a proposed budget based on the current federal allocation, which is usually published by the U.S. Department of Education in the month of March. The requirements of the application are published in the winter of the program year and due to the VDOE in the spring. These continuation applications provide updates to the state on provider performance and service and proposed plans to meet emerging needs and opportunities. Continuation applications are not evaluated by the LWDBs or outside grant reviewers. These applications require the resubmission of federal and state certifications and assurances.

#### State Priorities

These priorities were stated in the 2020-2022 and 2023-2025 competitive applications for the multi-year awards and are echoed in the 2020-2024 Combined State Plan.

**Career Pathways Model.** A career pathways model is prioritized in the Combined State Plan as the most effective means to support adult learners and job seekers. This model combines the academic and workforce preparation programming from adult education with occupational skills training leading to stackable industry-recognized credentials and supportive services secured through partnerships with the local Virginia Career Works Center, social services, and/or community-based organizations. To support the implementation of this model, Virginia offers the [*Sector Strategies and Career Pathways Academy*](https://www.sscpa-va.com/) to train workforce development agency staff. Each applicant must demonstrate that at least one staff member has completed this training and earned the certification from this training or plans to do so within the first year of the award. Each regional adult education provider and IELCE provider must also articulate how their program design implements career pathways for participants.

**Corrections Education and Other Institutionalized Individuals (C&I).** Correctional education instruction must conform to the federal purpose and allowable activities to support educational programs for criminal offenders in correctional institutions and for other institutionalized individuals. These services must give priority to individuals who are likely to leave the institution within five years of participation in the program.

**Integrated Education and Training.** All adult education and IELCE providers must offer at least one integrated education and training (IET) cohort per program year that leads to a recognized postsecondary credential.

**Service to Those with Low Levels of Literacy.** Per federal requirement, AEFLA providers are obligated to serve all eligible learners, particularly those eligible individuals who have low levels of literacy, are English language learners, or are individuals with disabilities. Should an eligible provider wish to collaborate with a community-based literacy organization to offer supplemental tutoring services as a programming model, a signed letter of support clearly articulating how services will be coordinated and participants will be dually-enrolled must be included in the application.

**Standards-based Instruction**. Since July 1, 2019, all providers have been expected to demonstrate full implementation of SBI in all classes using the College and Career Readiness Standards as well as the English Language Proficiency Standards. See[resources](https://valrc.org/standards-based-instruction/) such as the *Implementing Standards-based Instruction in Virginia: A Technical Assistance Roadmap* for definitions and resources for realizing this priority in all settings.

**Workforce Preparation Activities.** Since the publication of the initial WIOA Combined State Plan in 2017, all providers have been expected to deliver workforce preparation activities concurrently with all programming types.

### Cultivating Regional Cooperation and Coordination

A main goal of WIOA is to encourage the alignment of the workforce development efforts it directly funds and to encourage collaboration with other state and local partners to offer coordinated services and a career pathways approach to workforce development. In order to realize this vision, adult education programs must be embedded within networks of service providers. This section presents information on the responsibilities of the regional program manager to manage the involvement of each member of the consortium in their regions, and for all program managers to establish and cultivate partnerships that will contribute to their programming and service to learners.

#### Regional Memorandum of Understanding

The VDOE transitioned to a regional adult education delivery system in 2012 to improve the quality and performance of program delivery. The regions correspond to the Virginia Planning Districts to reflect the characteristics of local economies and resources and build on established workforce partnerships. Providers of adult education in each of Virginia’s 22 adult education regions must coordinate with all the public-school divisions in the region and are strongly encouraged to coordinate with the local community college(s) and other institutions of higher education as well.

Currently all regional programs fit the definition of a consortium (see Glossary of Terms) and are operating with a regional Memorandum of Understanding (MOU) that defines each member’s roles and responsibilities. Because competitive awards are issued for a three-year period, it is expedient to design the MOUs to cover the same period, although it is not required. The MOUs may be updated as necessary. This section provides key areas to include in the discussions that inform the MOU, and if necessary, to include in the MOU document.

**Responsibilities of regional partners.** The MOUs should spell out what each member is responsible for providing to the consortium and what each member may expect from their participation. The services provided by the regional program manager and any regional staff should be clearly stated. Any employment-related expectations for consortium member employees, such as which entity manages Human Resource issues including annual evaluations and teacher observations, should be clearly stated. Expectations for local monitoring, performance accountability, and fiscal management should be stated in the MOU.

Consortium members also provide valuable services to the adult education program that can be articulated in the MOU including:

* amplifying and disseminating outreach and recruitment messages in the community;
* coordinating technology supports for families in the community;
* including an adult education program representative on local councils and planning initiatives;
* coordinating career and technical education and integrated education and training opportunities;
* coordinating early childhood education and adult education and family literacy activities; or
* providing fiscal services for lottery-funded grants, if the fiscal agent is not a school division.

**Amount of match/fiscal contribution.** Contribution of matching funds, whether cash or in-kind, as well as how they will be provided to the fiscal agent (invoiced, services provided at no-cost, etc.) should be included in the MOU to ensure transparency and commitment. In-kind contributions should be supported by documentation of fair market value, evaluated frequently (doing so to be current with the time period of the MOU would suffice). See more about in-kind match contributions in the Uniform Guidance [Sec. 200.306(b)](https://www.govinfo.gov/content/pkg/CFR-2014-title2-vol1/xml/CFR-2014-title2-vol1-part200.xml#seqnum200.306).

**Ensuring equitable service coverage across the region.** Although the fiscal agent has the responsibility to manage the grant funds, programming schedules, and performance across the region, the consortium members should be engaged in decision making about ensuring equitable service across the region. This may mean that sparsely populated areas do not have in-person classes scheduled, but service to those residents may be provided elsewhere or through distance education.

**Advisory Councils.** Having a regional advisory council with representatives from the consortium plus other key stakeholders in the community is critical to sustaining regional cooperation and coordination. Those who will serve on the council should be named along with the number of formal meetings planned per year. Consider inviting educational and employer allies and a student or alumni representative to serve on your advisory council as well.

#### Community Partners and Collaborators

There are many other entities in communities across the Commonwealth that work to advance adults’ education and training opportunities. A significant part of the job of being a program manager is to establish professional relationships with contacts in these types of entities in the community.

The [Virginia Literacy Foundation](http://www.virginialiteracy.org/) (VLF) is a special partner to VDOE’s adult education programs with a similar mission: “to promote literacy across the lifespan for all Virginians.” The VLF supports community-based literacy organizations (CBLOs) through small two-year grants, tutor training, technical assistance, and resources. Many of these CBLOs are closely associated with a regional adult education program, dually enrolling students and/or working with an established referral pipeline. Some CBLOs are recipients of IELCE grants from the VDOE. Partnering with CBLOs to use tutors for supplemental instruction in classes or additional small group sessions can be an effective way to assist students to persist and reach their goals. Literacy tutors are welcome to engage in the professional development and training provided by the VALRC, and many programs include local tutors in professional development offered regionally.

Also look to involve partners such as:

* community colleges
* community health centers and providers
* Department of Social Security offices
* employers and workforce recruiters
* faith-based and interfaith community improvement entities
* food banks and food distribution centers
* Head Start and early childhood education providers
* libraries
* local foundations and funders
* local professional service clubs and associations
* local, unaffiliated literacy volunteer groups
* private sector services, such as banks and credit unions
* probation and parole offices and reentry councils
* public housing authorities
* refugee resettlement agencies

What can partners do for your program and students? Cultivating partnership and community networks takes time and patience, but when service providers find ways to meet mutual goals through shared clients and efforts, both organizations benefit, and client services are enhanced. Some specific avenues to pursue with all community-based partners include:

* boosting outreach and in-reach. Community-based partners can amplify your outreach by sharing your message about your programming and offerings. They also may have communication channels, including native language websites, radio stations, and faith-based institutions, that reach into specific populations (in-reach) as a trusted messenger, offering new ways to engage communities.
* enriching instruction and engagement. Partners can add experiences and expertise to your instructional programming so students can benefit from the exposure to new ideas. Partners may be able to join programming as guest speakers or presenters, host on-site visits or field trips, or provide materials to use in the classroom.
* providing support services. Service providers and funders in the community may be able to provide benefits and incentives for students that federal funds cannot purchase – items such as gas cards, gift cards, stipends, professional clothes, scholarships, technology equipment, and more. Identifying what students need to be successful in education and employment can help partners rally around specific sponsorship.
* connecting to community and civic activities. Community service providers can assist students and their families to get involved in civic life in the community. This is especially important to incorporate into programming for new immigrants, but community-focused, problem-based learning is a well-established approach to any adult education program design and builds student leadership for all students. Interfaith community activities for community improvement, voter registration drives, community clean-up days, food drives – all of these activities involve students in broader community improvement efforts and can lead to opportunities to build their confidence and apply their skills.
* sponsoring work-based learning experiences. Employers and nonprofits can offer students work-based learning experiences. These can vary from single day visits to work sites to formal internships. Employers with high rates of growth and need for employees or employers in relatively unknown fields may be candidates to provide these experiences to increase awareness of the career opportunities in their sector.

## PERFORMANCE ACCOUNTABILITY

### Being a Data and Assessment Leader

Performance accountability is as critical a task for program managers as fiscal accountability. Performance accountability shows the state office, your local partners, future funders, and prospective students that your program is worth the investment of their dollars and their time. This section does not address every step that is required, serve as a training manual for the state data reporting system, or cover the primary indicators of performance for WIOA. Rather, this section paints a broad picture through guided questions of the responsibilities that are encompassed in the program manager’s role as a data and assessment leader.

The state office, along with the VALRC, offers data trainings and policy updates in a variety of formats throughout the year, and it is critical that program managers stay up to date with data policies. New managers may find useful the following resource from the national NRS technical assistance team: [*The First 90 Days: A Checklist for New NRS Data Leaders*](https://nrsweb.org/resources/first-90-days-checklist-new-nrs-data-leaders)*.* This checklist is designed to help new NRS data leaders develop a strategic plan for the first 90 days in their role. It highlights key tasks that will help individuals new to the role establish themselves as data leaders and create a plan to help them navigate their new role.

#### Managing Data Collection and Entry

Data collection begins with an interaction with each prospective student. Establishing protocols and expectations for front-line staff on how to register students by completing and submitting the Adult Student Profile Document (ASPD) is the first step to ensuring high-quality data. Whether students are registered online, at classroom sites, or during registration events at central locations, having a fully completed ASPD will allow the data entry staff to create student records in the state management information system (MIS).

The information recorded on the ASPD is personally identifiable information (PII) that must be treated as confidential. Providers must have protocols in place to safeguard the confidentiality of this information during registration, in storage, and in transport. Guidelines for lockable storage and secure transfer and protocols for staff should be articulated and the steps should be monitored regularly for compliance.

All instructors should be familiar with their responsibilities in relation to the current [*Assessment and Distance Education Policy for Virginia Adult Education and Literacy Programs*](https://www.doe.virginia.gov/teaching-learning-assessment/specialized-instruction/adult-education/program-policy-guidance), which is renewed each program year. VALRC maintains a self-paced course designed for instructors that covers the policy. The policy describes the steps providers must take to ensure valid and reliable assessments are administered to students and recorded in the state MIS, including the requirement that all staff administering assessments must be certified to do so. Whether pre- and post-tests are administered in a central location, remotely, or in the classroom, instructors should understand and follow the processes and the expectations established in your program and by the test publisher(s).

The VDOE has several required schedules to ensure that program data is entered into the state MIS in a timely manner:

1. [Data Entry Guidance](https://www.doe.virginia.gov/home/showpublisheddocument/34724/638260705528570000) directs programs to enter attendance hours by class participation date (not a weekly or monthly total) and to ensure that all current program data is entered and validated by the 20th of the following month.
2. The Assessment and Distance Education Policy #4 states that a valid pre-test must be administered to 100 percent of all eligible learners within the first six hours of instruction.
3. The Assessment and Distance Education Policy #9 states that assessments must be scored within seven business days of the test administration and reported in the state MIS within 30 business days during the fiscal year.

#### Managing the Data Flow and Reporting

How do ASPDs, attendance hours, test results, and other data “flow” in your program? Answering the following questions can reveal that flow and expose processes that may need strengthening:

* What is the secure process by which sensitive data are collected or reported from satellite sites to the central office?
* What is the schedule to ensure the central office staff enters attendance and testing data according to the required timelines?
* What data policies and procedures are established by the fiscal agent of the regional office and any local agencies?
* What are the internal controls that ensure the data reported by teachers and local programs to the central office staff are accurate and complete?
* What are the internal controls that ensure that the data reported by the regional or program office to the state MIS are accurate and complete?

Similar to the concept of internal controls (section Overview of Federal and State Regulations, subsection: Federal Legislation and Regulations) for fiscal reporting, a segregation of duties should be established so that the data entered into the state MIS is checked against source data by at least two people before submission or certification of completeness. Articulating this process and regular monitoring for accuracy will reinforce roles and responsibilities in ensuring that your program maintains and reports high-quality, accurate data while maintaining the confidentiality of students’ PII.

#### Using Data for Decision Making

As your program collects, compiles, and enters data into the state MIS, you can begin to see patterns that can help inform programming decisions and inquiries:

* Which classes or sites are fully enrolled and which are not?
* Are there community changes, such as an influx of English language learners or a business closure that might suggest a class should be added in a new location?
* Is the proportion of ABE, ASE, and ESOL students similar or different from the previous year?
* Are students making gains at similar rates across classes and sites and across student subpopulations?
* Are IET students completing and credentialing at similar rates across the various sector options and classes?
* Are retention and persistence patterns similar across classes and sites and across student subpopulations?

Investigating questions like these with your staff can lead to conversations about resources, community-level changes, programming challenges, and other issues that may be impacting staff efforts. Having these conversations frequently during the year allows for course corrections and resource management. Other questions may come from watching single data points such as enrollment, secondary credentials earned, or attendance hours. Communicating these types of data points can be done as reminders that can keep staff focused on key metrics. As milestones are met, use the opportunity to celebrate successes with your staff, students, and community.

#### Meeting Performance Targets

Targets for the primary indicators of performance are negotiated between the state office and the federal Office of Career, Technical, and Adult Education every two years as a component of the Combined State Plan submission process. Program year 2020-2021 was the first year in which all primary indicators have numeric targets. The VDOE sets these and other milestone targets for providers in order for the state to meet overall performance. Providers see their performance toward the targets on the annual Risk Rubric (section Program Improvement, subsection: Participating in the State Monitoring and Evaluation Process), where regional or local performance is presented as a percentage of the state target. The meeting of targets is impacted by strategic program design as well as careful data management.

Enrollment targets for regional programs are established by the state office as part of the grant competition every three years. American Community Survey data is analyzed for educational attainment at the local level. Enrollment targets reflect three percent of the number of adults (over 18 years of age) in the region without a high school diploma or equivalent; this formula mirrors how the state’s enrollment target is set by the U.S. Department of Education. IELCE programs propose an enrollment target in their grant application.

Regions that do not include a dense, urban area often struggle to reach their enrollment target. Working with other local service providers as recruitment partners can help identify potential students within the community and support services available to address participation barriers such as transportation and child care. See suggestions for outreach in the section Program Management and Delivery, subsection: Growing and Sustaining Your Program.

Measurable skill gains (MSG) performance includes five types of gains. The first two types are available to all adult education participants; types three, four, and five are available only to participants in workplace adult education and literacy and IET classes. The five MSG types are:

1. Educational functioning level gains earned through pre- and post-test scores, transition from the diagnostic to assessment phase in the National External Diploma Program, and program exit and transition into postsecondary education
2. Achievement of a secondary credential
3. Postsecondary transcript or report card for sufficient credit hours and satisfactory academic progress
4. Satisfactory or better progress report toward established milestones
5. Passing a technical or occupational knowledge-based exam or established benchmark

Each gain type requires program managers and data specialists to establish tracking and reporting systems to ensure that the gain is reported and documented properly. The IET Planning Tools (available on the [Professional Development](https://www.doe.virginia.gov/teaching-learning-assessment/specialized-instruction/adult-education/professional-development) page) should indicate any planned types 3, 4, and 5 MSGs so the VDOE staff can provide technical assistance if necessary.

Type 1, educational functioning level gains earned through pre- and post-tests scores, is the most commonly achieved MSG in adult education, and the [*Assessment and Distance Education Policy*](https://www.doe.virginia.gov/teaching-learning-assessment/specialized-instruction/adult-education/program-policy-guidance) sets an expected percentage of students in each program who will meet the milestone of completing a post-test. For PY2023-2024, the expected post-test rate is 60 percent. Meeting this rate requires a close tracking of students’ accrual of attendance hours and alerting teachers and assessors when students will become eligible for post-testing so that plans for administering assessments can be made.

Post-exit indicators include three employment-related measures and a credential attainment measure. The employment measures are: employment in the second quarter after exit, employment in the 4th quarter after exit, and median earnings in the second quarter. These data are collected through data matches conducted by the state office with the Virginia Employment Commission (VEC) for individuals employed in Virginia and with the State Wage Interchange System (SWIS) for individuals employed outside of Virginia. These data matches are conducted based on an individual’s Social Security number (SSN). For this reason, programs should provide multiple opportunities for students to disclose their SSN so that their record can be included in the data match.

The credential attainment indicator includes two types of credentials:

1) A secondary school diploma or recognized equivalent during participation or within one year after exit from the program. The receipt of a secondary credential is counted in this measure only if the participant also enters postsecondary education or training, or employment within one year after exit.

2) A recognized postsecondary credential earned during participation or within one year after exit from the program.

These data are collected through data matches conducted by the state office with the Virginia Community College System (VCCS) and the National Student Clearinghouse. Programs can supplement the data matches with documentation and reporting on credentials earned in programs not covered in these two data matches. For example, if a student earns a recognized postsecondary credential in a training program that is not affiliated with an institute of higher education, that credential is eligible to be reported in the student’s record and documented in the student’s file at the program.

#### The Data Cycle

The following table is a representation of the annual data cycle of which program managers and data entry staff should be knowledgeable. As shown, there are ongoing data activities with at least two program years’ data nearly all year long.

|  |  |  |
| --- | --- | --- |
| **Month** | **Prior Program Year Data** | **Current Program Year Data** |
| **July** | Providers finalize entering all federal and state adult education data from the previous fiscal year and ensuring the accuracy of the data. | While programs begin offering adult education services in the new fiscal year and collecting data such as registration information, test results, and attendance, program staff are unable to enter the data until August when the previous year’s data has been locked and distributed for matching.  Programs should take this opportunity to determine which test administrators will need to update their state-required test recertifications during the fiscal year and setting a schedule. |
| **August** | State staff prepares the data to be distributed for data matching. This may include reaching out to programs to update and/or correct data. Once the previous year’s data has been finalized, it is locked and prepared for data matching. Data is exported to data match partners (Virginia Community College System, Virginia Employment Commission, National Student Clearinghouse, State Wage Interchange System) and received with positive matches. | System opens; classes, testing activity, attendance, and gain information since July 1 added. |
| **September** | Data match results are returned and the data is cleaned. The finalized results are uploaded into NRS tables and the data tables are submitted to the NRS by Oct. 1. |  |
| **October** | Tables with post-exit indicator data are updated for providers to review. | Programs should review their data and make sure that data entry is complete and accurate by October 20.  State staff will download data and analyze for completeness, accuracy, and program performance. |
| **November** | Data points used to complete the Program Risk Rubrics. |  |
| **December** |  |  |
| **January** |  | Programs should review their data and make sure that data entry is complete and accurate by January 20.  State office staff will download data and analyze for completeness, accuracy, and program performance.  State staff conduct technical assistance calls to discuss current and prior years’ data and other concerns. |
| **February** |  |  |
| **March** | U.S. Department of Education publishes Statewide Performance Reports. |  |
| **April** |  | Programs should review their data and make sure that data entry is complete and accurate by March 20. State staff will download data and analyze for completeness, accuracy, and program performance. |
| **May** |  | End-of-Year Guidance released. ASPD for upcoming fiscal year released. |
| **June** |  |  |

#### Communicating Your Data

How do you communicate the value of your program to potential partners and students? The ultimate successes of your students are the long-term impacts such as stable employment, increased income, achievement of citizenship, increased civic involvement, and greater assistance and role modeling for their children’s education. Impact measures like these develop over years and are not necessarily part of the annual accountability cycle, but they are important to capture to demonstrate your program’s value. This section presents some guiding questions to consider how to communicate both types of data.

**How can you use data to recruit and motivate students?** Can you articulate to potential students the average number of hours required to reach a goal or the percentage of students who earn their secondary credential? How many postsecondary credentials were earned and how many postsecondary transitions were made by students in your program? Do you know the average pay scale and the job opportunities for workers with credentials they can earn in your program? Using student experience data such as this can motivate new students to persist to reach their goals.

**How can you use your data for outreach to partners and potential funders?** Consider framing your messaging around student goal attainment to focus on the impact your program has had on students’ lives and the health of the community. The post-exit indicator data (employment, earnings, and credentials earned) that are collected and reported as part of WIOA provides a window into the impact, but only within a one-year timeframe. How can you create opportunities for students to stay in touch and share their stories of longer-term impact? Are students and graduates willing to speak directly to partners and potential funders? Can you collect student responses to questions your partners and potential funders have for students? If your partners are assisting with recruitment, what data points would motivate their clients and contribute to their accountability reports?

**How can you present your program’s impact?** How the data is conveyed is important. Clear graphics may convey your meaning more directly than narrative reports. The VDOE and the VALRC often share data points and templates, such as the VDOE fact sheets (see the adult education [homepage](https://www.doe.virginia.gov/teaching-learning-assessment/specialized-instruction/adult-education/program-policy-guidance) for fact sheets created for student, employer, and partner audiences) or annual data presentations (see the VDOE professional development [webpage](https://www.doe.virginia.gov/teaching-learning-assessment/specialized-instruction/adult-education/professional-development)) that can be recreated and customized with your program’s data. Updates to these fact sheets are planned for, at minimum, every two years. See also a video recording on how to communicate your data, [*Know Your Numbers: What Story Does Your HSE Data Tell?*](https://youtu.be/h4mf8zoqeQI)

#### Where to Find Key Data Concepts

Information about data responsibilities and key concepts may be found in a number of published policy documents. This list presents a crosswalk of some of the most common sub-topics and where they can be found in those source documents:

* The [Data Dictionary](https://www.doe.virginia.gov/home/showpublisheddocument/34730/638053295011830000) defines terms related to reporting.
* [Data Entry Guidance](https://www.doe.virginia.gov/home/showpublisheddocument/34724/638260705528570000) provides key concepts and expectations.
* The [*Assessment and Distance Education Policy for Virginia Adult Education and Literacy Programs*](https://www.doe.virginia.gov/teaching-learning-assessment/specialized-instruction/adult-education/program-policy-guidance), published each year by July 1, includes assessment and distance education policies and assessment publisher guidelines.
* [Director’s Memos](https://www.doe.virginia.gov/teaching-learning-assessment/specialized-instruction/adult-education/adult-education-resources) contain mid-year updates to data and assessment policies.
* The [Combined State Plan](https://virginiacareerworks.com/wp-content/uploads/WIOA_Plan_in_Federal_Review-2020-12-02_12-16-56_pm-Virginia_PYs_2020-2023.pdf) publishes the negotiated performance targets for the primary indicators of performance; the negotiated targets for program years 2020-2021 and 2021-2022 are in the following table. Each Plan must also be modified every two years. The [Two-Year Modification](https://virginiacareerworks.com/wp-content/uploads/Approved-Virginia-CSP-2022-Modification-8-2022.pdf) for program years 2022-2023 and 2023-2024 is in effect as of July 1, 2022.

**Table 5.1 Negotiated Performance Targets**

| **Primary Indicator of Performance** | **Final Negotiated**  **PY 2022-2023** | **Final Negotiated**  **PY 2023-2024** |
| --- | --- | --- |
| Measurable Skill Gains | 27% | 27.5% |
| Employment (2nd Quarter After Exit) | 24% | 25% |
| Employment (4th Quarter After Exit) | 25.7% | 26% |
| Median Earnings (2nd Quarter After Exit) | $5,475 | $5,500 |
| Credential Attainment Rate | 27% | 27.5% |
| Effectiveness in Serving Employers | Baseline | Baseline |

## PROGRAM IMPROVEMENT

### Participating in the State Monitoring and Evaluation Process

Funded adult education providers are required to cooperate fully with monitoring and evaluation activities sponsored by the state Office of Career, Technical, and Adult Education. This requirement is iterated in both the *Virginia Department of Education, Office of Career, Technical, and Adult Education Statement of Assurances* and Attachment A *Terms and Conditions* received with each grant award notification (section Overview of Federal and State Regulations, subsection: State Code and Regulations). Regular monitoring of providers is a key responsibility of the VDOE as the administrator of the AEFLA funds.

Monitoring protocols have been established to support programs in implementing a variety of activities and policies that improve access to, and quality of, adult education services.

#### Program Self-Assessment

The annual program monitoring cycle begins with each adult education provider completing a local or regional Program Self-Assessment Survey. The Survey is designed to help providers document their leadership and management processes and assist the Virginia Adult Learning Resource Center (VALRC) and state office staff to plan technical assistance. Providers are asked to assess whether or not the program is meeting certain criteria in a variety of programmatic categories. Areas of assessment include, program quality, data management, fiscal management, integrated education and training (IET), compliance with state and federal regulations, and regional administration for regional program managers.

The Survey also allows for providers to describe their technical assistance needs as they relate to each question on the survey. This information, along with the Survey data on program performance, forms the basis of discussion for annual technical assistance calls between the VDOE and each funded provider.

#### Program Identification

The identification of programs to receive a federal program monitoring review is determined by a risk analysis that is applied to local and regional adult education programs. The analysis is based on indicators that reflect programs’ student enrollments, attainment of specified performance measures, post-exit indicators, the percentage of federal and state-awarded funds expended in the previous fiscal year, the program’s last participation in a VDOE federal program monitoring on-site review, and the number of new or substantially changed key personnel or systems. These indicators, with their assigned point values, are applied to each program and a total score is obtained. Higher scores indicate higher risk. The risk being assessed is to the VDOE as the administrator of AEFLA funds. For example, when a program is unable to meet the MSG target set for the state, the risk is higher that the entire state will not meet the target.

Each program receives a Program Risk Rubric in November, reflecting its performance in the previous program year. The combination of program risk and a rotation system, which ensures that all programs receive site visits within a certain period of time, is used to identify programs to receive site visits within an annual cycle and to produce an annual monitoring schedule.

#### Site Visits

The VDOE plans and implements virtual and in-person site monitoring and targeted visits, leads monitoring teams, prepares monitoring reports for local and regional programs, and ensures that Corrective Action Plans (CAPs) are closed in a timely manner.

The goals of monitoring site visits, both in-person and virtual visits, are to:

* ensure that programs meet federal and state requirements;
* improve the quality of state and federally funded adult education activities;
* provide assistance in identifying and resolving compliance issues; and
* ensure the accuracy, validity, and reliability of data collection and data reporting and the adherence to required policies and procedures for program accountability.

In-person site visits usually take place over three consecutive days in the spring and involve a team of state staff plus a peer program manager and/or a VALRC staff member. Peer reviewers are chosen from programs not receiving a site visit in the current year, and preferably, from the same type of fiscal agent (school division, community college, CBLO).

Virtual site visits may be spread out over a two-week period and take place at any time of the year. A modified site-visit protocol is used for virtual program monitoring. The modified protocol focuses on data management and regional administration for AEFLA-funded programs. The protocol for IELCE program (Sec. 243 funds) monitoring focuses on data management and the delivery of integrated English literacy and civics education in combination with integrated education and training activities.

Targeted monitoring visits, both in-person and virtual, are also conducted on an as-needed basis and can occur at any time throughout the year. Up to two components from the site-visit protocol will be used for targeted monitoring visits. Scheduling for targeted monitoring site visits is determined based on staff availability and the estimated time needed to resolve the issue(s) in question; therefore, targeted site visits will vary in length. Depending on the issue(s), a peer reviewer may be recruited to participate. A targeted monitoring visit does not mean the program is exempt from a full in-person site visit.

#### Program Manager Responsibilities for Site Visits

The regional or local program manager is responsible for the ensuring that the following site-visit monitoring and evaluation responsibilities are met:

* Completing the Site-Visit Preliminary Information Form
* Using the Site-Visit Protocol to collect and organize materials for review
* Ensuring program staff participation in the monitoring process
* Providing site-visit workspace (for on-site visits) that can ensure privacy and security
* Ensuring the availability of staff for the data demonstration
* Arranging and scheduling staff interviews
* Establishing and scheduling teacher and student focus groups
* Scheduling classroom observations
* Scheduling interview with Local Workforce Development Board Director (LWDB) or representative, or Career Works Center Operator
* Scheduling the participation of the school district superintendent or community college president or representative and designated program staff in an exit interview

To see more detailed descriptions of the responsibilities below and the components of a monitoring cycle, refer to the [Site-Visit Information](https://www.doe.virginia.gov/home/showpublisheddocument/34732/638053295017300000) document located on the VDOE Adult Education Data, Monitoring & Evaluation webpage.

#### Annual Monitoring Cycle

The annual program monitoring cycle follows an established set of occurrences that provides continuity and consistency of approach. Providers’ awareness of this yearly timeline can facilitate the coordination of local oversight and monitoring efforts with state-level monitoring activities.

The table below shows the general timeline of activities that comprises a local or regional program’s participation in the VDOE annual adult education program monitoring cycle.

**Table 6.1 Timeline for Participation in VDOE Adult Education Program Monitoring Cycle**

| **Date** | **Activity** |
| --- | --- |
| September - October | Complete and submit the Program Self-Assessment (online survey) |
| November - December | Receive Program Risk Rubrics |
| January | Participate with VDOE in technical assistance calls |
| February | Receive, if an identified program, notification of upcoming site visit |
| March - May | Participate, if an identified program, in on-site and/or virtual monitoring visit |
| May - July | Receive Report of Findings (ROF) |
| August | Review and respond to corrective action plans (ongoing) |

#### Report of Findings and Corrective Action

VDOE staff will develop a preliminary report based on the findings of the site visit. The report will contain the following elements:

* Site-Visit Protocol criteria that were met,
* Site-Visit Protocol criteria that were not met (if applicable),
* Required corrective action for unmet criteria, and
* Recommended actions for program improvement.

The preliminary report will then be forwarded to the program for review and comment. Any comments furnished by the program will be considered by the VDOE staff when drafting the final Report of Findings (ROF). The ROF, sent to the school division superintendent, community college president, or executive director, may contain corrective action items. If so, the program will be required to address these items by established deadline(s). Corrective action deadlines will vary depending on the nature of the action required. While the VDOE will work with programs to address corrective action items, the responsibility of effecting change rests with the program. For more detailed information about completing CAPs, see the *Completing a Corrective Action Plan* document located on the VDOE Adult Education [Data, Monitoring & Evaluation webpage](https://www.doe.virginia.gov/teaching-learning-assessment/specialized-instruction/adult-education/data-monitoring-evaluation).

When the corrective actions for all findings on the CAP have been completed and approved, the VDOE issues a *Letter of Closure* to the school division superintendent, community college president, or executive director with a copy to the program manager.

#### Evaluation Efforts

How are programs evaluating their effectiveness? Does your program have a continuous improvement plan? A continuous improvement plan allows the program to focus on the factors that affect performance outcomes and prioritize what matters most for improvement. Consider who should be involved in implementing and evaluating the continuous improvement plan. At a minimum, programs should include their leadership team, staff, specialists, teachers, students, and stakeholders. Also consider how often data and processes are assessed and analyzed to determine improved outcomes. Have you assigned responsibilities and target completion dates? Are programs making adjustments if desired outcomes are not met? Continuous improvement plans are important for program growth and success.

Customer satisfaction feedback is important to any service provider in any sector. In human services, such as education, it can provide insight into how clients or students are experiencing the programming you offer. How can your program provide opportunities for current and former students to provide anonymous feedback? Providers located at community colleges may be able to adopt and adapt an existing student survey mechanism. Providers at school divisions or CBLOs may need to create ways for students to provide anonymous feedback and establish a process for collecting, analyzing, and responding to that feedback. Student leadership activities, such as student councils, focus groups, and/or a student representative on advisory committees, can also provide valuable student input into programming decisions and the interpretation of survey results. Soliciting and responding to student feedback is an important component of continuous improvement.

Businesses and postsecondary education and training programs are also the customers of adult education. How well prepared are your students for advancement into employment or further education or training? Surveys of business customer satisfaction with the workforce system in general are conducted by the business services teams of the local workforce development boards (section Alignment with WIOA Partners, subsection: Cross-Agency Projects). Participating on these teams provides the opportunity to inform the survey and the interpretation of the results. Staying in touch with the local community college deans of workforce programs or particular occupational disciplines will allow opportunities for feedback on how well prepared your students are to enter and succeed in their courses.

The VDOE participates in state and national evaluations of adult education and requests that providers do so as well when called upon to submit information. Under WIOA, the U.S. Department of Education launched two national evaluations:

1. The [*National Study of the Implementation of Adult Education Under the Workforce Innovation and Opportunity Act*](https://ies.ed.gov/ncee/projects/evaluation/pathways_wioa.asp) is collecting data on how states and local adult education programs are providing AEFLA services under WIOA. The study will include an analysis of state-level administrative data on adult education, a survey of state directors of adult education, and a survey of the approximately 2,200 federally-funded adult education programs. Providers in Virginia responded to the survey in the fall of 2019. Results of this study are the first such national data since 2003.
2. The study entitled [*Assessing Evidence of Effectiveness in Adult Education*](https://www.mathematica.org/our-publications-and-findings/projects/assessing-evidence-of-effectiveness-in-adult-education) will examine the effectiveness of specific adult education practices. The first phase of this project is a design study that will review the research on effective strategies in adult education; identify and prioritize practices, approaches, or strategies for evaluation; and design evaluations to provide evidence on the effects of these interventions. The U.S. Department of Education might conduct one or more of these evaluations in future phases of the study.

Responding to both state and federal evaluations of adult education programming and the delivery of adult education services is essential to the success of these evaluation efforts. All program managers should embrace these efforts and understand that participation is a core responsibility of their position.

## ALIGNMENT WITH WIOA PARTNERS

### WIOA Combined State Plan for the Commonwealth of Virginia 2020-2023

The Governor of each state is required to submit to the federal departments of Education and Labor a combined or unified state plan every four years. This puts forth the vision and strategies the state agencies will use to implement WIOA through the workforce development system. States submit updates to the Plan in the second of each four years. Plans must be available for public comment before submission.

Virginia submits a combined state plan, which includes additional agency partners beyond the core WIOA title programs. The vision for the [*WIOA Combined State Plan for the Commonwealth of Virginia 2020-2023*](https://virginiacareerworks.com/wp-content/uploads/Virginia_CSP_PYs_2020-2023-FINAL-Federally-Approved.pdf) is to “improve economic opportunity for all Virginians by serving those who are not yet earning a sustainable wage and, as important, by focusing the resources and mechanisms of our workforce system to recruit people into the workforce and connecting them to businesses in high demand industries.” The strategic goals for the Combined State Plan were modified for the [*2 Year Modification*](https://virginiacareerworks.com/wp-content/uploads/Approved-Virginia-CSP-2022-Modification-8-2022.pdf) to read:

1. Build Virginia’s talent supply to align with current and anticipated business needs and to earn sustainable wages
2. Increase business engagement and deliver value to business customers by filling jobs in high-demand occupations that are strategic to Virginia’s economy and strengthen Virginia’s regions
3. Increase outreach and recruitment efforts to make available services more well-known and accessible to stimulate job readiness and career awareness
4. Reduce workforce system barriers through collaborative integration and innovative solutions

Partner agencies and programs included in the Virginia Combined State Plan are:

* The Adult, Dislocated Worker, and Youth program authorized under Title I-B of WIOA and administered by the Virginia Community College System (VCCS)
* The Adult Education and Family Literacy program authorized under Title II of WIOA and administered by the Virginia Department of Education (VDOE)
* The Wagner-Peyser Employment Services program authorized under Title III of WIOA and administered by the Virginia Employment Commission (VEC)
* The Vocational Rehabilitation programs authorized under Title IV of WIOA and administered by the Department for Aging and Rehabilitative Services (DARS) and the Department for the Blind and Visually Impaired (DBVI)
* Career and technical education programs authorized under The Carl D. Perkins Career and Technical Education Act, as amended by the Strengthening Career and Technical Education for the 21st Century Act in 2018 (Perkins V), (VDOE)
* Temporary Assistance for Needy Families Program (TANF) and Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T), administered by the Virginia Department of Social Services (VDSS)
* Trade Adjustment Assistance for Workers program (VEC)
* Jobs for Veterans State Grant program (VEC)
* Unemployment Insurance program (VEC)
* Registered Apprenticeship, administered by the Virginia Department of Labor and Industry (DOLI)

The implementation by these partner programs of the strategies and the goals and objectives that support them is guided by the Virginia Workforce Development Board, which provides advice and counsel to the Governor’s workforce efforts and guidance to the programs covered in the Combined State Plan. The Secretary of Education is designated as the unique representative for title II on the Board. [Meetings](https://virginiacareerworks.com/events/list/?tribe_event_display=past&tribe_paged=1) of the Virginia Workforce Development Board are open to the public and often showcase economic research and forecasting that is of interest to all partners.

The strategic goals of the Combined State Plan in turn drive the local workforce development board’s (LWDB) strategic plans (“local plans”), which are submitted every two years to the WIOA title I administrator as required by WIOA (title I, Sec. 107(d)(11)(A)). These local plans shape the work of the regional workforce efforts, including the occupational focus of career pathway and training investments by the partners. Adult education providers are asked to align their work with the strategies of the local plan, including the industry focus of their career pathways work and IET cohorts. During the competitive application phase, adult education applications are reviewed by representatives of the LWDBs for such alignment.

### One-Stop, or Career Works, Center Responsibilities

Adult education providers are a vital part of the integrated workforce development system through their community programming as well as their presence and services in the [Virginia Career Works Centers](https://virginiacareerworks.com/). These Centers are administered regionally by local workforce development boards (LWDB) with a mandate to connect employers with prospective employees through education and training providers and a network of professional partners. (These Centers are called American Job Centers by the U.S. departments of Education and Labor.) Some adult education region’s geography corresponds exactly to that of its workforce area, whereas other regions share a workforce area.

All adult education providers are mandated partners within the Virginia workforce development system and the Career Works Centers. As such, providers are responsible for aligning career pathway programming through collaborative relationships with the local comprehensive Career Works Center(s) and partner organizations. Regional adult education programs must also contribute to the financial management of the infrastructure costs of each comprehensive Center in their region. These can be either cash or in-kind contributions or both.

Regional program managers must ensure that, as part of their relationship with the Career Works Center(s) in their region, adult education providers fulfill the following five key federal responsibilities:

1. Provide access through the Career Works Center system to adult education and literacy activities either in person at the Center or through direct access such as through virtual or remote connections from the Center to the adult education location;
2. Contribute to the infrastructure costs for the Career Works Centers, in accordance with the methods agreed upon by the local workforce development board (LWDB) and described in the memorandum of understanding (MOU);
3. Enter into an MOU with the LWDB that articulates all partners’ responsibilities and fiscal contributions;
4. Participate in the operation of the Career Works Centers consistent with the terms of the MOU, such as serving on committees, contributing to the development of the LWDB plan, and representing the Center in the community; and
5. Provide representation to the LWDB, which in some cases may be coordinated with other adult education regional programs.

These responsibilities should be articulated in the annual joint MOU that governs the contributing partners to the Career Works Center, which must include an Infrastructure Cost Agreement (IFA). Infrastructure costs are, by definition, non-personnel costs and can be either cash or in-kind contributions or both. All grant recipients must propose in their budget and report annually, by object code and line item, the amount of federal funding and in-kind support contributed to the IFA. Such funds are to be charged to the Administrative component of the federal budget unless they are in support of direct services, such as a rental fee for a classroom space.

While each region negotiates these MOUs and IFAs separately, there are common elements to consider. These documents are to be:

* a product of local discussion and negotiation among all partners to ensure successful integration and implementation of partner programs;
* used to establish the roles and responsibilities of the Local WDB, the chief elected official, and the Career Works Center partners; and
* include the amount of funds contributed from each partner.

The funding provided by the partners to cover the operating costs, including infrastructure costs, of the one-stop delivery system must be based on the partner programs’ proportionate use of the system and the relative benefit received. For example, partners should not be asked to cover the costs of an office space they are not occupying or for the entirety of a public resource lab. See the federal guidance for more details and citations (U.S. Department of Education, Office of Career, Technical, and Adult Education, [Program Memo 17-3](https://www2.ed.gov/about/offices/list/ovae/pi/AdultEd/octae-program-memo-17-3.pdf)). Should a program manager need assistance in negotiating the program’s contribution, involve the state office as early as possible. Be aware that should the local area fail to reach agreement for an MOU, the process reverts to the Governor’s office for what is called the “state funding mechanism.” Should this occur, partners and the Governor’s office representative would be guided by the Virginia Board of Workforce Development [Policy #20-01](https://virginiacareerworks.com/virginia_board/vbwd-policy-20-01-one-stop-center-state-funding-mechanism/).

Virginia Career Works is a branded entity and represents a commitment to access, trust, support, and innovation. Be sure to communicate with your local Center staff about using the logo and the colors of the brand on your outreach materials. You can request access to a toolkit that includes the brand standards and high-resolution images.

Serving as a partner in the workforce development system enriches adult education by providing access to recruiting venues, partners who can contribute to student services and supports, expertise such as job placement and work experiences for students, and relationships with local and regional employers. Through the focus on career pathways and integrated education and training models in the Combined State Plan, adult education providers will continue to have opportunities to collaborate with workforce development partners to expand offerings to students.

### Cross-Agency Projects

Through the collaboration fostered by the Combined State Plan, several cross-agency projects and activities are under way that provide opportunities for workforce development system practitioners to receive training and tools that support the implementation of the Combined State Plan’s priorities. As a core partner, adult education is represented in these projects. Regional and local program managers should be familiar with expectations for their own participation and that of members of their teams.

**Sector Strategy and Career Pathways Academy.** To support the implementation of the Combined State Plan’s priorities of career pathway programming and a sector strategy business services approach, Virginia has offered the Sector Strategies and Career Pathways Academy (SSCPA) to train workforce development agency staff and disseminate shared approaches across agencies. Each AEFLA-funded provider was expected to have at least one staff member complete and earn certification from this training academy in the 2020-2023 cycle.

**Common Referral Portal.** The [Common Referral Portal](https://va-career-works.myjourney.com/) is a web-based, mobile-friendly tool that can refer users to services that are designed to assist them in advancing their career paths and financial independence through training, certification, education, and employment services. Individuals seeking services can create an account, answer common intake questions, choose referral recommendations, and begin connecting with services.

Currently supported by six state agencies, including the VDOE, the portal is a “no wrong door” approach to service referrals among workforce development agencies. This approach means that service seekers do not have to submit redundant information when accessing services, which will make their experience more user friendly. With improved communication among providers, partners will be able to coordinate services in a holistic approach. As one of the six partnering agencies, the VDOE is leading the implementation efforts of the portal for adult education providers. See a VALRC Progress newsletter [article](https://valrc.org/progress/progress-june-2020-issue/) on how the Portal works.

The portal creates referrals and tracks user actions and outcomes through a Data Trust, a secure data match functioning between participating agencies. The establishment of a Data Trust to serve as a link across title program data systems supports the coordination of client services and the reporting of outcomes and co-enrollment. The analytics made available by this data will facilitate system-wide efforts of continuous improvement.

**Business Services Teams.** The LWDBs coordinate regional Business Services Teams that are designed to meet the recruitment and workforce training needs of employers and to speak in a unified voice for all of the Virginia Career Works partners in each region. Adult education participation on the teams is critical to ensure that the education and training opportunities available through AEFLA funding are represented to area businesses and that employment opportunities are communicated to and through adult education programs to students. Speaking in a unified voice to local employers has been and continues to be a Combined State Plan priority. Coordinating outreach from the workforce development system as well as listening tours for the WIOA partners has yielded a more coherent message about the Virginia Career Works partner services available to businesses.

Serving employers is one of the six primary indicators of performance under WIOA Sec. 116. In Virginia, one way this indicator is captured is in quarterly reports of “Business Services,” which tally activities by title partner. See the annual reports of this indicator and learn more in a recorded [tutorial](https://www.youtube.com/watch?v=rfFstMi-dUY&feature=youtu.be).

**Accessibility Task Force and Training.** Grounded in the Combined State Plan, a cross-agency task force leads efforts to ensure programmatic and physical accessibility of Virginia Career Works Centers and partners’ services offered through the Centers. A cross-agency team conducts monitoring visits to the Centers to fulfill the statutory requirement to certify Centers as accessible. In addition, the taskforce develops and hosts cross-agency training opportunities on issues of accessibility and customer-centered service design and communication. See the section on “Being an Instructional Leader” (section: Program Management and Delivery) for more information on serving adults with disabilities.

## GLOSSARY OF TERMS

*Adult Basic Education (ABE) —* A program of academic instruction and education services below the secondary level that increases an individual's ability to read, write, and speak in English and perform mathematics necessary to attain a secondary school diploma or its recognized equivalent, transition to postsecondary education or training, and obtain employment.

*Adult Education —* Academic instruction and education services below the postsecondary level that increase an individual’s ability to

* read, write, and speak English and perform mathematics or other activities necessary for the attainment of a secondary school diploma or its recognized equivalent;
* transition to postsecondary education and training; and
* obtain employment.

*Adult Education and Literacy Activities —* Programs, activities, and services that include:

(a) adult education,

(b) literacy,

(c) workplace adult education and literacy activities,

(d) family literacy activities,

(e) English language acquisition activities,

(f) integrated English literacy and civics education,

(g) workforce preparation activities, or

(h) integrated education and training.

*Adult High School Diploma —* In Virginia, an adult high school diploma can be earned in multiple ways. One option is for the adult student to complete all of the course requirements that were in place at the time they entered the ninth grade, with the exception of health and physical education. Certain requirements for specific assessments may be waived if the assessments are no longer administered to students in Virginia public schools. A second option is the General Achievement Adult High School Diploma (GAAHSD), which is intended to provide a diploma option for individuals who are at least 18 years of age, not enrolled in public education, and not subject to the compulsory attendance requirements of §22.1-254 of the *Code of Virginia*. A third option is the National External Diploma Program (NEDP), a competency-based, applied performance assessment system leading to an Adult High School Diploma. Specific requirements for Board-approved adult high school diploma options can be found on the[Adult Secondary Completion Options](https://www.doe.virginia.gov/teaching-learning-assessment/specialized-instruction/adult-education/adult-secondary-completion-options) page.

*Adult Secondary Education (ASE)* *—* A program of academic instruction and education services at the secondary level that increases an individual's ability to read, write, and perform mathematics necessary to attain a secondary school diploma or its recognized equivalent, transition to postsecondary education or training, and obtain employment.

*Adult Student Profile Document (ASPD)* — The state-approved intake and progress form for adult education that all programs funded under title II, WIOA, must use. A new ASPD must be completed for each student who receives adult education and literacy services and for each new Period of Participation (PoP). Local and regional adult education programs are not permitted to make adjustments to or modify the contents of the form without prior approval from the state office.

*Barriers to Employment —* A barrier to employment affects placement of the participant in unsubsidized employment and is disclosed by the participant at the time of program entry. Participants may disclose more than one barrier to employment and identify them on the ASPD. Programs should report all barriers to employment categories disclosed by the participant and identified below. Each category has a definition listed in the [Data Dictionary for Adult Education](https://www.doe.virginia.gov/home/showpublisheddocument/34730/638053295011830000).

1. Displaced Homemaker.

2. English Language Learner, Low Literacy Level, Cultural Barriers.

3. Exhausting Temporary Assistance for Needy Families (TANF) within Two Years.

4. Ex-Offender.

5. Homeless.

6. Long-Term Unemployed.

7. Low-Income.

8. Migrant or Seasonal Farmworker.

9. Individual with Disabilities.

10. Single Parent.

11. Youth In or Has Aged Out of Foster Care.

*Basic Skills Deficient* — An individual who:

* is a youth whose English reading, writing, or computing skills are at or below the eighth-grade level on a generally accepted standardized test; or
* is a youth or adult who is unable to compute or solve problems, or read, write, or speak English at a level necessary to function on the job, in the individual’s family, or in society.

*Blended learning* — Blended learning refers to a model in which instructors consider both in-class and online, or synchronous and asynchronous, instruction as part of a collective whole, making adjustments to synchronous teaching based on what the instructors see as they monitor student’s asynchronous online work and alter online assignments based on what they observe in class. In blended learning, the content is tightly aligned across the in-person and online, or synchronous and asynchronous, instruction such that each component is critical to the experience.

*Career Coach* – A person who guides another in planning and managing their career and developing an array of options related to career goals (from the *Facilitating Career Development Student Manual*). A career coach working in an adult education or other workforce development service agency may be responsible for working with students to develop individual career and education plans, secure college or training program admissions and financial aid, and acquire needed support services through human services agencies and community-based organizations. This position may also be known as a Career Navigator.

*Career Pathway —* A combination of rigorous and high-quality education, training, and other services that:

* aligns with the skill needs of industries in the local, regional, or state economy;
* prepares an individual to be successful in any of a full range of secondary or postsecondary education options, including apprenticeships registered under the National Apprenticeship Act (29 U.S.C. 50 et seq.);
* includes counseling to support an individual in achieving the individual’s education and career goals;
* includes, as appropriate, education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster;
* organizes education, training, and other services to meet the particular needs of an individual in a manner that accelerates the educational and career advancement of the individual to the extent practicable;
* enables an individual to attain a secondary school diploma or its recognized equivalent, and at least one recognized postsecondary credential; and
* helps an individual enter or advance within a specific occupation or occupational cluster.

The *Sector Strategies and Career Pathways Academy* adopted the following definition of career pathway: “A series of connected education and training programs and support services that enable individuals to secure employment within a specific industry or occupational sector and to advance over time to successively higher levels of education or employment in that sector. Each step on a career pathway is designed explicitly to prepare for the next level of employment and education.”

*Career Readiness Certificate (CRC) —* The Career Readiness Certificate is an assessment-based certificate issued at four levels: Bronze, Silver, Gold, and Platinum. The level attained is based on scores earned on the WorkKeys competency tests in Applied Math, Workplace Documents, and Graphic Literacy to ascertain the employability skills of an individual.

*Community-Based Literacy Organization (CBLO) —* These local, private, not-for-profit organizations provide literacy instruction using volunteer tutors who often work one-on-one with learners.

*Civics Education —* A key outcome of participation in adult education is that students are empowered to be more engaged in and informed about their roles as parents, employees, and community members. Civics education is a critical component of all levels and types of adult education, preparing students to engage in respectful dialogue, become knowledgeable about American history and civic structures, and understand the rights and responsibilities of citizenship and civic participation.

*Co-Enrollment and Concurrent Enrollment* — Enrollment by an eligible individual in two or more of the six core programs administered under WIOA: the Adult, Dislocated Worker, and Youth programs (Virginia Career Works, or title I); Adult Education and Family Literacy Act programs (title II); Employment Service program (Virginia Employment Commission (VEC), or title III); and Vocational Rehabilitation program (Department for Aging and Rehabilitative Services (DARS), Department for the Blind and Vision Impaired (DBVI), or title IV). Concurrent enrollment refers to an eligible individual’s participation or enrollment in multiple activities or programs that occur simultaneously, not sequentially, for the purpose of accelerating the attainment of educational and training outcomes.

*Combined State Plan —* Each state receiving WIOA funding must create a four-year unified or combined plan for core programs and other partners that outlines how services will be provided and expanded, particularly for eligible individuals who face barriers to employment, and how the local workforce development board (LWDB) will facilitate co-enrollment of participants across core programs within a seamless workforce system.

*Consortium* *—* A coalition of eligible providers that provides adult education and literacy activities consistent with criteria identified under AEFLA, title II. A consortium applying for a grant must designate a fiscal agent. Included in the application must be a Memorandum of Agreement or Understanding (MOA or MOU) recognizing the fiscal agent and outlining the roles and responsibilities assumed by both the fiscal agent and the other eligible provider members of the consortium. Each member of the consortium must submit the required Demonstrated Effectiveness Tables as part of the application.

*Correctional Institution* — Any prison; jail; reformatory; work farm; detention center; or halfway house, community-based rehabilitation center, or any other similar institution designed for the confinement or rehabilitation of criminal offenders.

*Criminal Offender* — Any individual who is charged with or convicted of any criminal offense.

*Demonstrated Effectiveness —* An eligible provider must demonstrate effectiveness by providing performance data on its record of improving the skills of eligible individuals, particularly eligible individuals who have low levels of literacy, in the content domains of reading, writing, mathematics, English language acquisition, and other subject areas relevant to the services contained in the grant application package. An eligible provider must also provide information regarding its outcomes for participants related to employment, attainment of secondary school diploma or its recognized equivalent, and transition to postsecondary education and training. There are two ways in which an eligible provider may meet the requirements:

1. An eligible provider that has been funded under title II of WIOA must provide performance data required under section 116 to demonstrate past effectiveness.

2. An eligible provider that has not been previously funded under title II of the Act must provide performance data to demonstrate its past effectiveness in serving basic skills-deficient eligible individuals, including evidence of its success in achieving outcomes listed above.

Only applications that provide documentation of demonstrated effectiveness that meets or exceeds the state-set performance levels in providing adult education and literacy activities will be evaluated for eligibility for AEFLA funds.

*Digital Literacy* — Skills associated with using technology to enable users to find, evaluate, organize, create, and communicate information. Technology should be used to enhance teaching and learning, including the use of effective distance education technology and instructional software. See resources for [distance education](https://valrc.org/resources/?_sft_resource_topic=distance-education).

*Digital Navigator –* Digital navigators are trusted guides who assist community members in internet adoption and the use of computing devices. Digital navigation services include ongoing assistance with affordable internet access, device acquisition, technical skills, and application support.See more at <https://www.digitalinclusion.org/>.

*Director’s Memo —* An official communication from the Director of the VDOE Office of Career, Technical, and Adult Education to regional adult education program managers and IELCE program managers. These are archived on the [Adult Education Resource webpage](https://www.doe.virginia.gov/teaching-learning-assessment/specialized-instruction/adult-education/adult-education-resources).

*Distance Education* — Formal learning activity where students and instructors are separated by geography, time, or both and approved distance education curricula are employed for providing the majority of the instruction. Distance learning materials may be delivered through a variety of media, including but not limited to, print, audio recording, videotape, broadcasts, computer software, web-based programs, and other online technology. Teachers support distance learners through communication by mail, telephone, e-mail, or online technologies and software. For more information, see the [*Assessment and Distance Education Policy for Virginia Adult Education and Literacy Programs*](https://www.doe.virginia.gov/teaching-learning-assessment/specialized-instruction/adult-education/program-policy-guidance).

*Distance Learners —* Students who receive a majority of their instruction through approved distance education services. A student is classified as a distance learner if the majority of the student’s hours earned in a program year are derived by their participation in distance learning activities.

*Educational Functioning Levels (EFL)* —The National Reporting System (NRS) divides literacy instruction into six levels each for ABE and English as a second language (ESL). Each ABE literacy level has a description of basic reading, writing, numeracy, and functional and workplace skills that can be expected from a person functioning at each level. The ESL literacy levels describe speaking and listening skills and basic reading, writing, and functional workplace skills that can be expected from a person functioning at each level. Test scores for pre- and post-testing are tied to the NRS EFLs for initial placement and for reporting advancement across levels. For information about descriptors for each EFL, see Exhibit 2.2: Functioning Level Table in “[*NRS Technical Assistance Guidance for Performance Accountability under the Workforce Innovation and Opportunity Act*](https://nrsweb.org/policy-data/nrs-ta-guide),” March, 2021.

*Eligible Individual*— An eligible individual is one:

(a) who has attained 16 years of age;

(b) who is not enrolled or required to be enrolled in secondary school under state law; and

(c) who

i) is basic skills deficient;

ii) does not have a secondary school diploma or its recognized equivalent, and has not achieved an equivalent level of education; or

iii) is an English language learner.

*Eligible Provider* — An organization that has demonstrated effectiveness in providing adult education and literacy activities is eligible to apply for a grant or contract. These organizations may include, but are not limited to:

(a) local educational agency;

(b) community-based organization or faith-based organization;

(c) volunteer literacy organization;

(d) institution of higher education;

(e) public or private nonprofit agency;

(f) library;

(g) public housing authority;

(h) nonprofit institution that is not described in (a) through (g) and has the ability to provide adult education and literacy activities to eligible individuals;

(i) consortium or coalition of the agencies, organizations, institutions, libraries, or authorities described in (a) through (h); and

(j) partnership between an employer and an entity described in (a) through (i).

*Eligible Training Provider List –* Eligible Training Provider and Programs List (ETPL) is a list of state approved Eligible Training Providers (ETP) and their state approved training programs. The ETPL is administered by the WIOA Title I Administrator in partnership with the Local Workforce Development Boards (LWDBs). A program of training services is one or more courses or classes, or a structured regimen that leads to a recognized post-secondary credential, secondary school diploma or its equivalent, employment, or measurable skill gain towards such a credential or employment. An ETP is the only type of entity that can receive WIOA Title I-B funding for training services. An adult education provider may apply to be an ETP.

*English as a Second Language (ESL)* or *English for Speakers of Other Languages (ESOL)* — Instruction designed for an adult whose educational functioning level is equivalent to a particular ESL English language proficiency level listed in the NRS educational functioning level table. (The acronym ESL is used only for NRS reporting of educational functioning levels.)

*English Language Acquisition (ELA) program* — Instruction that is designed to help eligible individuals who are English language learners (ELL) achieve competence in reading, writing, speaking, and comprehension of the English language; that leads to the attainment of a secondary school diploma or its recognized equivalent, and transition to postsecondary education and training or employment.

*English Language Learner (ELL)* — An eligible individual 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.

*Family Literacy Activities* —Activities of sufficient intensity and quality to make sustainable improvements in the economic prospects for a family and that better enable parents or family members to support their children’s learning needs and that integrate all of the following activities:

* Parent or family adult education and literacy activities that lead to readiness for postsecondary education or training, career advancement, and economic self-sufficiency;
* Interactive literacy activities between parents or family members and their children;
* Training for parents or family members regarding how to be the primary teacher for their children and full partners in the education of their children; and
* An age-appropriate education to prepare children for success in school and life experiences.

Providers offering family literacy activities must abide by the Special Rule in WIOA Sec. 231(d).

*Flipped Classroom* — A blended learning model in which students learn the concepts first in their own space. Teachers then use the synchronous class time to discuss what the students learned and apply those concepts to the classroom activities.

*GED Ready*®— GED Ready® is the official practice test for the 2014 GED® test series. It is half the length of the GED® operational test. The scores earned on this test are good predictors of scores earned on the GED® operational test. GED Ready® provides all students with a diagnostic report to help guide a personal study plan based on their performance on the practice test.

*GED*® *Test* — The GED® test was developed so that adults who did not finish high school could demonstrate the attainment of abilities normally associated with the completion of a high school program of study. Adults must pass a battery of four tests to earn a GED® certificate: Reasoning through Language Arts (RLA), Mathematical Reasoning, Science, and Social Studies. Significant changes to the GED® test’s format were instituted in January 2014, including a computer-based delivery system. Currently, this is the only high school equivalency test approved for administration in Virginia.

*GED*® *Testing Service (GEDTS)* — GED® Testing Service is a joint venture of the American Council on Education and Pearson VUE, the two organizations that produce and govern the GED® test.

*General Adult Education (GAE)* — One of the funding streams, along with SLCA and PluggedIn VA, that is awarded from the Virginia General Assembly budget as the required state match to the federal AEFLA award. The GAE funds are awarded to each of the 22 adult education regions in conjunction with the adult education funds. There is not a separate competitive grant application for these funds. Because these funds are declared as match to the federal funds, the expenditures must follow the same regulations and allowable activities (Sec. 221(b)(2)). Unlike federal funds, state funds are awarded for a one-year grant period and cannot be recouped for reallocation.

*High School Equivalency (HSE)* — The HSE is an option for individuals who did not graduate from high school to demonstrate the knowledge and skills which would have been acquired in the high school curriculum. Upon passing the HSE test, an equivalency credential is earned. In Virginia, the credential is called a certificate.

*Hybrid learning*— Hybrid learning models employ both an online curriculum product and in-class or synchronous teaching, but the assigned work that students complete online may or may not be directly aligned to what happens in the classroom.

*Hyflex learning*— HyFlex is an emerging instructional method in adult education. In this method, learners can choose to participate in online or in-person synchronous classes, or to complete asynchronous online activities. This requires the teacher to simultaneously teach in-person and online learners.

*Incumbent Worker* —An individual who has an established employment history with an employer for six months or more.

*Integrated Education and Training (IET)* —A service approach that provides adult education and literacy activities concurrently and contextually with workforce preparation activities and workforce training for a specific occupation or occupational cluster for the purpose of educational and career advancement. As a part of a career pathway, the design of an IET program should support the local workforce development board plans. The IET program must include three components:

1. adult education and literacy activities,
2. workforce preparation activities, and
3. workforce training for a specific occupation or occupational cluster.

In order to meet the required three components, services must be provided concurrently and contextually such that

(a) within the overall scope of a particular integrated education and training program, the adult education and literacy activities, workforce preparation activities, and workforce training:

1. are each of sufficient intensity and quality, and based on the most rigorous research available, particularly with respect to improving reading, writing, mathematics, and English proficiency of eligible individuals;

2. occur simultaneously; and

3. use occupationally relevant instructional materials.

(b) the integrated education and training program has a single set of learning objectives that identifies specific adult education content, workforce preparation activities, and workforce training competencies, and the program activities are organized to function cooperatively.

A provider meets the requirement that the integrated education and training program provided is for the purpose of educational and career advancement if:

1. the adult education component of the program is aligned with the College and Career Readiness Standards for adult education as described in the Combined State Plan, and
2. the integrated education and training program is part of a career pathway.

*Individual Student Alternative Education Plan (ISAEP)* — In accordance with the *Code of Virginia* [§22.1-254D.E](https://law.lis.virginia.gov/vacode/title22.1/chapter14/section22.1-254/), the Individual Student Alternative Education Plan (ISAEP) program fulfills compulsory attendance requirements for students who are at least 16 years of age and for whom an ISAEP is written. With a key focus on dropout prevention, the ISAEP program provides an opportunity for qualifying students to work toward a high school equivalency credential; participate in career, technical, and work-based learning activities; and complete an economics and personal finance course. In order to participate, students must be enrolled in public education and meet program eligibility requirements.

*Integrated English Literacy and Civics Education (IELCE)* — There are two sections in title II that describe the allowable use of funds to provide IELCE services to English language learners, including professionals with degrees and credentials in their native countries:

* *IELCE Activities:* Education services provided under section 231 that enable adults to achieve competency in the English language and acquire the basic and more advanced skills needed to function effectively as parents, workers, and citizens in the United States.

Such services shall include:

1. instruction in literacy and English language acquisition,
2. instruction on the rights and responsibilities of citizenship and civic participation, and
3. may include workforce training.

* *IELCE Program:* Education services provided under Section 243 that enable adults to achieve competency in the English language and acquire the basic and more advanced skills needed to function effectively as parents, workers, and citizens in the United States.

Programs are designed to:

* 1. prepare adults who are English language learners for, and place such adults in, unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency; and
  2. integrate with the local workforce development system and its functions to carry out the activities of the program.

Such services shall include instruction in:

1. literacy and English language acquisition,
2. instruction on the rights and responsibilities of citizenship and civic participation, and
3. must include integrated education and training (see definition).

*Learning Management System (LMS)* — A platform for the administration, documentation, tracking, creation, and delivery of educational content.

*Literacy* — An individual’s ability to read, write, and speak in English, compute, and solve problems at levels of proficiency necessary to function on the job, in the family of the individual, and in society.

*Literacy Information and Communication System (LINCS)* — The Literacy Information and Communication System ([LINCS](https://lincs.ed.gov)) is a national leadership initiative of the U.S. Department of Education, Office of Career, Technical, and Adult Education (OCTAE) to expand evidence-based practice in the field of adult education. LINCS demonstrates OCTAE’s commitment to delivering high-quality, on-demand educational opportunities to practitioners of adult education, so those practitioners can help adult learners successfully transition to postsecondary education and 21st century jobs. LINCS provides adult educators with the information, resources, professional development activities, and online network they need to enhance their practice and ensure their adult students receive high-quality learning opportunities.

*Local Workforce Development Board (LWDB) Local Plan* — Under WIOA, local Workforce Development Boards are required to articulate a vision for the local area’s workforce development system. They are to create a local plan that is focused on the unique needs and resources of the local area and develop a blueprint to use the area’s strategic workforce assets to meet the requirements of the changing economy, which is consistent with the current Combined State Plan. Local Workforce Development Boards review the competitive adult education grants to ensure that they are aligned to the LWDB Local Plan.

*Measurable Skill Gains (MSG)* — One of the six primary indicators of performance identified under section 116 of WIOA; there are five types of MSGs.

*Mobile Learning* — learning that is accessed through a mobile device such as a tablet or smartphone.

*National External Diploma Program (NEDP)* — The National External Diploma Program, which leads to an adult high school diploma, is an applied performance assessment system that assesses the high school level skills of adults. Administered by Comprehensive Adult Student Assessment Systems (CASAS), the NEDP evaluates the reading, writing, math, and workforce readiness skills of participants in life and work contexts. The program is self-paced, flexible, and has no timed tests. The program is for self-directed adult students who are comfortable working independently. Participation in local and regional external diploma programs is available to adults who are 18 years of age and older who did not complete high school and are not enrolled in public education. An adult high school diploma, recognized by the Virginia Board of Education, shall be awarded to an adult student who demonstrates through applied performance 100 percent mastery of the NEDP Generalized Competencies.

*National Reporting System (NRS)* — The National Reporting System (NRS) is the accountability system for the federally funded, state-administered adult education program. It embodies the accountability requirements of the Workforce Innovation and Opportunity Act (WIOA) for the adult education and literacy program (title II) and reporting under WIOA.

*One-Stop System* — System identified in WIOA for the delivery of services by mandated partners, including adult education, in which service providers in a local area coordinate delivery of services to clients. In Virginia, the system is branded as the Virginia Career Works Centers.

*Online course* —An online course is defined as a subcategory of blended learning that:

* includes both synchronous and asynchronous learning activities that are organized through a learning management system (LMS);
* is instructor led, time limited, and content specific as described in a syllabus; and
* is conducted with managed enrollment and attendance requirements.

*Online Management of Education Grant Awards (OMEGA)* — Virginia Department of Education's automated reimbursement system is required to be used by most VDOE-funded adult education programs for financial management of adult education grants.

*Peer Tutoring within C&I activities* — an instructional model where one institutionalized individual assists in providing or enhancing learning opportunities for other institutionalized individuals. A peer tutoring program must be structured and overseen by educators who assist with training and supervising tutors, setting educational goals, establishing an individualized plan of instruction, and monitoring progress.

*Period of Participation (PoP)* — State performance on all core outcome measures under WIOA (except median earnings) is calculated as a percentage of the number of outcomes achieved divided by the number of periods of participation (PoPs) of each participant. When an individual enrolls in adult education, accumulates 12 or more contact hours, and then exits the program, he or she has completed a PoP. Multiple PoPs may occur during the same program year as a result of subsequent enrollments and exits. If the participant does not exit, the PoP remains ongoing.

*PluggedIn VA (PIVA)* — PluggedIn VA has been a career pathway program to prepare adults with workforce training and education to succeed in high-demand, high-wage careers. Beginning in PY 2022-2023, the program shifted from a competitive grant to an allocation to regional programs to support the cost of integrated education and training, including the provision of career coaching services.

*Postsecondary Educational Institution* — An institution of higher education that provides not less than a two-year program of instruction that is acceptable for credit toward a bachelor’s degree; a tribally controlled college or university; or a nonprofit educational institution offering certificate or apprenticeship programs at the postsecondary level.

*Recidivism* — refers to a person’s relapse into criminal behavior that results in re-arrest, reconviction, or return to prison with or without a new sentence during a three-year period following the prisoner's release.

*Recognized Postsecondary Credential* — For title II WIOA reporting, a recognized postsecondary credential is defined as a credential consisting of an industry-recognized certificate or certification, a certificate of completion of an apprenticeship, a license recognized by the state involved or the federal government, or an associate or baccalaureate degree. A recognized postsecondary credential is awarded in recognition of an individual’s attainment of measurable technical or industry/occupational skills necessary to obtain employment or advance within an industry/occupation. These technical or industry/occupational skills generally are based on standards developed or endorsed by employers or industry associations.

*Reentry and Postrelease Services* — services provided to a formerly incarcerated individual upon or shortly after release from a correctional institution that are designed to promote successful adjustment to the community and prevent recidivism. Examples include education, employment services, substance abuse treatment, housing support, mental and physical health care, and family reunification services.

*Sector Strategy* — the *Sector Strategy and Career Pathways Academy* adopted the definition from the National Governor’s Association: “Sector strategies are partnerships of employers within one industry that bring government, education, training, economic development, labor, and community organizations together to focus on the workforce needs of an industry within a regional labor market. At the state level, sector strategies are policies and investments that support the development of local sector partnerships. Sector strategies can do the following: address current and emerging skills gap, provide a means to engage directly with industry across traditional boundaries, and better align state programs and resources serving employers and workers”

*State Leadership Coordinating Funds (SLCA)* — One of the three state funding streams, along with GAE and PluggedIn VA, that is awarded from the Virginia General Assembly budget as the required state match to the federal AEFLA award. The SLCA funds are awarded to each of the 22 adult education regions in conjunction with the adult education funds. There is not a separate competitive grant application for these funds. Because these funds are declared as match to the federal funds, their expenditures must follow the same regulations and allowable activities (Sec. 221(b)(2)). Unlike federal funds, state funds are awarded for a one-year grant period and cannot be recouped for reallocation.

*Superintendent's Memo* — Official communication from the Virginia Superintendent of Public Instruction to local division superintendents regarding critical issues, certain adult education funding opportunities, and policies. Find [archived memos](https://www.doe.virginia.gov/about-vdoe/communications/superintendent-s-memos).

*Teachers of English to Speakers of Other Language (TESOL)* — TESOL is a professional organization for teachers of English as a second or foreign language. See the national organization [website](http://www.tesol.org) is located at and the [Virginia TESOL chapter website](http://vatesol.cloverpad.org/).

*Unsubsidized Employment* — refers to employment in the private or public sector for which the employer does not receive a subsidy from public funds to offset all or a part of the wages and costs of employing an individual.

*Virginia Association for Adult and Continuing Education (VAACE)* — [VAACE](http://vaace.org) is the professional association for Virginia’s adult and continuing education practitioners and administrators.

*Virginia Adult Education and Literacy Network (VAELN)* — VAELN is a state-wide listserv through the Virginia Adult Learning Resource Center that posts notices related to professional development, grants, and news that support the field of adult education.

*Virginia Adult Learning Resource Center (VALRC)* — The [VALRC](http://www.valrc.org) is funded by the Virginia Department of Education to provide adult education and literacy resources, publications, and training for Virginia’s adult education teachers and administrators.

*Virginia Literacy Foundation (VLF)* — The [Virginia Literacy Foundation](http://www.virginialiteracy.org) provides funding and technical support to private and volunteer literacy organizations throughout Virginia via challenge grants, training, and direct consultation. The VLF also works in partnership with public and private organizations to improve literacy with individuals and in the workplace, and to provide professional development training and research-based, promising practices for programs and staff.

*Virtual Virginia –* Virtual Virginia is a program of the VDOE that develops and offers online courses to K-12 students throughout the Commonwealth and professional learning opportunities for educators. Nine instructor-led, standards-aligned courses in mathematics, English language acquisition, and reading and language arts designed for adult education students have been developed and are freely available to providers.

*Workplace Adult Education and Literacy Activities* —Adult education and literacy activities offered by an eligible provider in collaboration with an employer or employee organization at a workplace or an off-site location that is designed to improve the productivity of the workforce.

*Workforce Innovation and Opportunity Act* — The Workforce Innovation and Opportunity Act (WIOA) was signed into law (Pub. L. 113-128) on July 22, 2014. This Act reauthorizes the Adult Education and Family Literacy Act (AEFLA) with several major revisions.

*Workforce Preparation Activities* —Activities, programs, or services designed to help an individual acquire a combination of basic academic skills, critical-thinking skills, digital literacy skills, and self-management skills, including competencies in utilizing resources, using information, working with others, understanding systems, and skills necessary for successful transition into and completion of postsecondary education or training, or employment, and other employability skills that increase an individual’s preparation for the workforce. See technical assistance [resources](https://www.ietblueprint.com/).

*Workforce Training* —AEFLA funds may only be used for training when that training is offered as a component of an approved IET (see definition above and [Director’s Memo #018-19](https://www.doe.virginia.gov/home/showpublisheddocument/35392/638054947146570000)). Services may include:

1. Occupational skills training, including training for nontraditional employment;
2. On-the-job training;
3. Incumbent worker training (see definition);
4. Programs that combine workplace training with related instruction, which may include cooperative education programs;
5. Training programs operated by the private sector;
6. Skill upgrading and retraining;
7. Entrepreneurial training;
8. Transitional jobs;
9. Job readiness training provided in combination with services described in any of the items 1-8 above;
10. Adult education and literacy activities, including activities of English language acquisition and integrated education and training programs, provided concurrently or in combination with services described in 1-7 above; and
11. Customized training conducted with a commitment by an employer or group of employers to employ an individual upon successful completion of the training.

**BACK COVER**

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