DEPARTMENT OF EDUCATION

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# Adult Education Memo No. 018-19

**DATE:** July 1, 2019

**TO:** Adult Education Program Administrators

**FROM:** George R. Willcox, Director, Operations and Accountability

Office of Career, Technical, and Adult Education

## SUBJECT: Revisions to Career and Training Services Reporting Guidance

Revised guidance from the U.S. Department of Education, received June 18, 2019, states that Adult Education and Family Literacy Act (AEFLA) funds may be used for the costs of credentials, certificates, and licenses as part of an integrated education and training (IET) program. This guidance is in effect for Virginia adult education providers delivering an IET program as of July 1, 2019.

The Workforce Innovation and Opportunity Act (WIOA) is designed to help job seekers access education, training, support services, and employment to succeed in the labor market and to match employers with the skilled workers they need to compete in the global economy. To support this goal, job seekers and students should be provided with career and training services to assist in their career advancement. State workforce agencies are required to report the costs that their local providers identify as these services on the annual Statewide Performance Report.

This guidance is based on federal guidance published by the U.S. Department of Labor and the U.S. Department of Education, issued as [Program Memo 17-2](https://www2.ed.gov/about/offices/list/ovae/pi/AdultEd/octae-program-memo-17-2.pdf) (August 23, 2017). Note that state funds are not reported through this process.

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Attachment

## Attachment A: Career and Training Services Reporting

Table 1 describes allowable career or training services for title II grantees. Some of the career services represent activities and functions provided as part of regular programming by adult education providers. Other career services may be new to adult education providers and should be incorporated into federally funded programming to realize the vision of WIOA for all clients.

The left column of the table comes directly from the federal guidance; the right column of the table is a crosswalk, listing four major categories of services. To create meaningful categories of costs, two sets of rows from the federal table are grouped together to reflect how services are typically provided in adult education. For each category, a non-exhaustive list of allowable costs follows.

Each fiscal agent should develop a procedure for documenting the percentage of staff time devoted to allowable activities, based on local wages and how these services are offered in various settings (One-Stop Center, satellite class, college campus, etc.). This cost methodology could include an analysis of time and effort reports, a time log, or other analyses approved by the state office. To standardize reporting, fiscal agents must identify personnel and material costs associated with these services as estimates in their budget workbooks at the time of grant application and submit actual career service expense reports annually on the Career and Training Services Expense Form. Note that only funds designated as instructional funds are reported as career and training services.

**Table 1: Applicable Career and Training Services for WIOA Title II Program**

| **From U.S. Department of Education, OCTAE** [**Program Memo 17-2**](https://www2.ed.gov/about/offices/list/ovae/pi/AdultEd/octae-program-memo-17-2.pdf)**,** Attachment 7 – Table C (p. 61)Applicable Career and Training Services for WIOA Title II AEFLA Program  | **Crosswalk of services to be documented** |
| --- | --- |
| Outreach, intake, and orientation information  | **Category: Outreach, intake, and initial assessment** |
| Initial assessment of skill levels including literacy, numeracy, and English language proficiency, as well as aptitudes, abilities, and supportive services[[1]](#footnote-1) needs  |  |
| Referrals to and coordination of activities with other programs and services  | **Category: Referrals and information dissemination** |
| Provision of performance information and program cost information on eligible providers of education, training, and workforce services by program and type of provider  |  |
| Provision of information on availability of supportive services or assistance and appropriate referrals (including child care; child support; medical or child health assistance available through the State’s Medicaid program and [Children’s Health Insurance Program] CHIP; [Supplemental Nutrition Assistance Program] SNAP benefits; [Earned Income Tax Credit] EITC; assistance under [Temporary Assistance to Needy Families] TANF, and other supportive services and transportation)  | **Category: Supportive services and assistance** |
| Training costs incurred in Integrated Education and Training (IET) programs | **Category: Training** |

### Category: Outreach, intake, and initial assessment

Programs may deliver these services as integrated or linked services, usually at first or early contact with enrolling students. Programs may calculate these costs based on:

**Materials and services** purchased to support outreach and assessment activities, tracked as actual costs in budgets and reimbursement requests; and

**Percentage of staff time** (which may include employee benefits) devoted to these activities.

**Examples of allowable costs and budget codes under this category**:

Object Code 1000: Percentage of salary of staff performing outreach, intake, or initial assessment activities

Object Code 2000: Percentage of FICA of staff performing outreach, intake, or initial assessment activities

Object Code 3000 Media, radio, and print ads; website design; bus signs or billboards; email outreach services; video design; copier services to be used for outreach activities

Object Code 4000 Internal printing to aid in outreach, intake, and assessments

Object Code 5000 Percentage of internet and/or phone connections; postage used for outreach; percentage of classroom space rental for assessment and intake

Object Code 6000 Cost of initial assessment materials; materials and supplies used for intake; cost of computers, printers, and supplies used exclusively for intake and initial assessments

### Category: Referrals and information dissemination

Programs may deliver these interrelated services through staff positions variously titled counselors, transition specialist, liaison, or navigators as well as by instructors at satellite classes. Programs may calculate the cost of these services based on:

**Materials** provided to students with this information, tracked as cost estimates in budget workbooks and as actual costs in reimbursement requests; and

**Percentage of staff time** (which may include employee benefits) devoted to these activities.

**Examples of allowable costs and budget codes under this category:**

Object Code 1000 Percentage of salary of staff performing referral and information dissemination activities

Object Code 2000 Percentage of FICA of staff performing referral and information dissemination activities

Object Code 3000 Contracted copier services; contracted printing; video creation for orientation or dissemination of referrals and information

Object Code 4000 Internal printing to aid in referrals and information dissemination

Object Code 5000 Percentage of internet and/or phone connections; postage used for referrals and information dissemination; percentage of office space rental and/or utilities for referrals and information dissemination; orientation resources

Object Code 6000 Cost of materials and supplies used for referrals and information dissemination

### Category: Supportive services and assistance

Programs may deliver and/or arrange for these supportive services to be delivered in various ways and with a variety of partner agencies. Programs are encouraged to partner with other WIOA and community partners to offer these supportive services to students. Programs may calculate the cost of these services based on:

**Materials** provided to students with this information, tracked as actual costs in budget workbooks and reimbursement requests; and

**Percentage of staff time** (which may include employee benefits) devoted to these activities.

**Examples of allowable costs and budget codes under this category:**

Object Code 1000 Percentage of salary of staff performing or coordinating supportive services

Object Code 2000 Percentage of FICA of staff performing or coordinating supportive services

### Category: Training

Under WIOA, title II providers are expected to establish partnerships with occupational training providers and other workforce partners to deliver Integrated Education and Training (IET) when possible. Title II funds may be used to support the following costs in support of IET programs: student tuition (termed “tuition” whether the training is offered at an institution of higher education or other qualified training provider); participant support costs such as student or activity fees; materials, supplies, and equipment used for instruction; and procured training instructor costs. Title II funds may be used to purchase credential assessments for recognized postsecondary credentials.

**Examples of allowable costs and budget codes under this category:**

Object Code 1000 Percentage of salary of staff delivering the occupational training course

Object Code 2000 Percentage of FICA paid for the percentage of staff time used to deliver occupational training course

Object Code 3000 Tuition and participant support costs (such as activity fees) for training program at postsecondary or training institution; transportation for training-related job-site visits; contracted training instructional services; cost of credentials, certifications, or licenses

Object Code 4000 Internal printing to deliver occupational training instruction

Object Code 5000 Percentage of classroom space rental for training instruction

Object Code 6000 Cost of materials, supplies, and equipment (under $5,000) used for training instruction

Object Code 8000 Costs of equipment (over $5,000) used for training instruction

1. [Supportive Services Desk Reference from the U.S. Department of Labor](https://ion.workforcegps.org/resources/2017/07/14/09/22/Supportive_Services_Desk_Reference) [↑](#footnote-ref-1)