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Governor

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Commissioner

**TO:** Adult Education Program Administrators

**FROM:** Dr. Cayanna Good, Assistant Commissioner of Adult Education

**RE:** Local Program Accountability Requirements Impacted by COVID-19

March 21, 2020

Dear Program Administrators,

As a follow up to the March 19, 2020 program administrator call, the Office of Adult Education (OAE) wanted to provide additional guidance on the accountability requirements during the COVID-19 outbreak. Please see below for more information.

**What accountability requirements is OAE Waiving?**

Given that adult education programs are closed for in-person instruction and instruction must be conducted virtually for the foreseeable future, OAE is waiving the following accountability requirement for the remainder of the FY20 Fiscal Year:

- ***Enrollment, Pre- and Post-testing, and MSG Targets:*** As programs are unable to provide face to face instruction with adult learners, OAE understands that it is not feasible to conduct intake and orientation or pre- or post-test students. Since programs will not be able to enroll students or collect data to measure measurable skill gains, **OAE is waiving all enrollment and MSG targets for the remainder of Fiscal Year 2020.**
- ***Student Minimum Contact Hours:*** Under OAE procedure B.6, students must be scheduled to attend a minimum of six instructional hours per week. Given that students will be receiving virtual instruction during the school closure, **OAE is waiving the requirement that students must have at least six instructional hours per week.** Please note, this waiver also means that programs **may not remove** students from the program for not attending six hours per week.

- ***Staffing and Responsibilities:*** Given the programmatic changes that will result from the school closures, OAE is waiving the requirements around what percentage of time certain staff positions must spend on certain activities. Specifically, OAE is waiving the following requirements:
  - Lead Teachers/site managers should spend a minimum of 30% and a maximum of 75% of their time in direct instruction, depending on the needs of the program to ensure program effectiveness. (OAE Policy & Procedure Manual, Definitions, Page 12)
  - Full-time instructors must teach a minimum of 70% of their weekly work schedule. (Fiscal Year 2020 Grant Assurance)
- ***Program Closures:*** OAE is waiving the requirement that classes may not be closed for more than two consecutive weeks without express written approval from the OAE. Request & written approval must be received at least 45 days prior to the date of closing. (Fiscal Year 2020 Grant Assurance)

**What accountability measures are still in place?**

Below are some key accountability measures that are still in place. Please note, this list is not exhaustive of every applicable federal or state policy pertaining to the use of Adult Education & Family Literacy Act (AEFLA) grant funds.

- ***Attendance Hours:*** In accordance with OAE Policy B.6, program must still enter attendance hours for students receiving and participating in virtual instruction. Programs must collect attendance weekly at a minimum and enter attendance within five business days. These attendance hours must be designated as “online hours” in GALIS. For more information regarding OAE’s distance education policy, please see [page 201 of OAE’s Policy and Procedure Manual](#). If you have questions about recording proxy contact hours, please contact Kimberlee Bryant at [kbryant@tcsg.edu](mailto:kbryant@tcsg.edu).
- ***Cost Documentation and Record Retention:*** Per OAE’s record retention policy, [2 CFR § 200.333](#), and [2 CFR § 200.302](#), programs must maintain all programmatic and financial records and documentation related to their adult education grant funds, including time and effort documentation, for a period of five and half years from the submission of the final financial report.

- ***Protecting Personally Identifiable Information:*** Programs must still ensure they have systems in place to protect student and staff personally identifiable information (PII). If you need assistance ensuring you have a system in place to protect PII, please contact Rebecca Ellis at [rellis@tcsd.edu](mailto:rellis@tcsd.edu).

Again, please note this list is not exhaustive of every applicable federal or state policy pertaining to the use of Adult Education & Family Literacy Act (AEFLA) funds. If a specific policy or regulation is not explicitly listed as waived in this document, please assume that that policy or regulation is still in place unless you receive written notification from OAE otherwise. OAE will continue to provide information about changes and updates to applicable state and federal policies and regulations as the situation evolves. In the meantime, if you have questions, please contact Rebecca Ellis, Director of Accountability, at [rellis@tcsd.edu](mailto:rellis@tcsd.edu) or 404.596.9797.

Sincerely,

Dr. Cayanna Good  
Assistant Commissioner of Adult Education