Technical College System of Georgia
Office of Adult Education
Local Program Policies & Procedures
Fiscal Year 2023
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I. ABOUT THE OFFICE OF ADULT EDUCATION

Key Takeaways

- The Technical College System of Georgia’s (TCSG) Office of Adult Education (OAE) administers adult education throughout the state by providing technical assistance and support to funded adult education programs and overseeing Georgia’s High School Equivalency (HSE) options.
- Two boards have the authority to establish policies and regulations that impact adult education – the Technical College System of Georgia State Board and the State Workforce Development Board.

Established under O.C.G.A § 20-4-15(c), The Technical College System of Georgia’s (TCSG) Office of Adult Education (OAE) provides adult education services to eligible individuals in the state of Georgia. OAE provides these services by awarding federal Workforce Innovation & Opportunity Act (WIOA) and state-appropriated funds to eligible providers to establish and operate adult education programs. OAE provides technical assistance, support, and professional development to all funded adult education programs to ensure the effective and efficient delivery of adult education and literacy services to eligible individuals. OAE also oversees Georgia’s High School Equivalency (HSE) options, including the GED®, HiSET®, and Career Plus HSE.

A. Mission
We are world class providers of adult education for all adults seeking to improve their lives regardless of zip code. We provide consistent, high-quality services and support.

B. Vision
To be the number one provider of adult education services that can help any adult build a bridge to a better future.
C. Organizational Structure

D. Governing Boards
Funding for adult education grants comes from both state and federal sources. The Office of Adult Education and its subrecipients must follow federal requirements and state policy specific to adult education. Two boards within Georgia have the authority to establish policies and regulations that impact adult education: (1) The Technical College System of Georgia State Board, and (2) the State Workforce Development Board.

1. Technical College System of Georgia State Board
The State Board of the Technical College System of Georgia, established under O.C.G.A. 20-4-11, is responsible for establishing standards, regulations and policies for the operation of the Technical College System of Georgia, including adult education. For example, the State Board has the authority to:

- Establish the standards and requirements for the attainment of a high school equivalency certificate (O.C.G.A. 20-4-11);
- Establish standards, rules, regulations, and policies for adult literacy education programs (O.C.G.A. 20-4-11);
- Establish an Adult Literacy Advisory Committee to advise and assist the State Board in developing goals, objectives, policies, methods, and standards for the delivery of adult literacy programs (O.C.G.A. 20-4-11);
• Annually determine the amount of funds needed to provide adult literacy and request that the Governor recommend that the General Assembly make such appropriations as needed (O.C.G.A § 20-4-16)

Please note, the above list is not exclusive of the State Board’s authority as it relates to adult education.

TCSG State Board members are appointed by the Governor and serve four-year terms. There is a maximum of 23 board members, with at least one member per Georgia congressional district. For more information regarding the TCSG State Board, including a list of current members, please click here.

2. State Workforce Development Board
Per WIOA Section 101, the State Workforce Development Board (SWDB) administers Workforce Innovation and Opportunity Act (WIOA) Title I funds across the state and oversees the Governor’s state workforce development initiatives, including those described in the State of Georgia Four Year WIOA Unified State Plan (20 CFR § 679.100). SWDB members are appointed by the Governor and include business owners, members of the Georgia General Assembly, statewide agency heads, local elected officials, and representatives from other workforce groups (20 CFR § 679.110). The SWDB has the authority to establish policies and make decisions that may impact adult education, such approving the state plan and developing strategies for the continuous improvement of one-stop delivery systems (20 CFR § 679.130).

To learn more about the State Workforce Development Board, please visit Work source Georgia’s website.
II. ADULT EDUCATION LEGISLATION

Key Takeaways

- The Workforce Innovation & Opportunity Act (WIOA) unites four core partners, including adult education, in helping individuals with barriers to employment obtain jobs in in-demand industries.
- WIOA Title II, also called the Adult Education & Family Literacy Act (AEFLA), provides funding for adult education programs.
- O.C.G.A § 20-4-15(c) establishes TCSG’s Office of Adult Education and charges it with providing adult education in all areas of the state.
- Georgia offers three High School Equivalency (HSE) options: (a) GED®, (b) HiSET®, and (c) Career Plus HSE.

A. Federal Legislation

1. Workforce Innovation and Opportunity Act (WIOA)

On July 22, 2014, President Obama signed the Workforce Innovation and Opportunity Act (WIOA) into law which revised and reauthorized the Workforce Investment Act of 1998 (WIA). The new law supports innovative strategies to keep pace with changing economic conditions and coordinates four core federal programs that support adult education, employment services, workforce development, and vocational rehabilitation activities. The core programs are:

- Adult, Dislocated Worker, and Youth, administered by the United States Department of Labor (DOL) under Title I;
- Adult Education and Family Literacy Act (AEFLA), administered by the United States Department of Education (USED) under Title II;
- Wagner-Peyser Act employment services, administered by DOL under Title III; and
- Vocational Rehabilitation Act, administered by USED under Title IV.

2. The Adult Education & Family Literacy Act

Title II of WIOA, also known as the Adult Education & Family Literacy Act (AEFLA), provides funding for adult education to accomplish the following objectives:

a. assist adults to become literate and obtain the knowledge and skills necessary for employment and economic self-sufficiency;

b. assist adults who are parents or family members to obtain the education and skills that –
   a) are necessary to becoming full partners in the educational development of their children; and b) lead to sustainable improvements in the economic opportunities for their family;
c. assist adults in attaining a secondary school diploma and in the transition to postsecondary education and training, including through career pathways; and
d. assist immigrants and other individuals who are English language learners in— a) improving their— (i) reading, writing, speaking, and comprehension skills in English; and (ii) mathematics skills; and b) acquiring an understanding of the American system of Government, individual freedom, and the responsibilities of citizenship.

OAE receives Title II funding from the U.S. Department of Education’s Office of Career, Technical & Adult Education (OCTAE), and grants these funds out to eligible providers through a competitive grant process, per WIOA Section 231(a).

To learn more, view the What is the Workforce Innovation & Opportunity Act? Webinar.

3. Georgia’s State Plan
Under WIOA, each state must develop a state plan that outlines its four-year strategy for the State’s workforce development system. Each of the core programs – including adult education - as well as other key Federal, State regional, and local agencies, contribute to and participate in the activities outlined in the State plan. State of Georgia Four Year WIOA Unified State Plan

B. State Legislation
1. Establishment of the Office of Adult Education
O.C.G.A § 20-4-15(c) establishes the Office of Adult Education (OAE) which reports to the Commissioner of the Technical College System of Georgia. Under this law, OAE must provide effective and efficient adult education programs in all areas of the state for all eligible Georgians (WIOA Section 202), including persons with disabilities and English language learners.

2. Verification of Eligibility for Public Benefit
Per O.C.G.A-36-1-50-36-1, state agencies or political subdivisions must ensure that all individuals 18 years of age or older receiving adult education services submit a Verification of Eligibility for Public Benefit Form verifying that the individual is: (a) a United States citizen, (b) a legal permanent resident of the United States, or (c) a qualified alien or non-immigrant under the Federal Immigration and Nationality Act with an alien number issued by the Department of Homeland Security or other federal immigration agency. More information about this process is available on our Data Management page.

3. High School Equivalency Options
The State of Georgia has three methods for an individual to obtain a High School Equivalency (HSE): (a) GED®, (b) HiSET®, and (c) Career Plus HSE. Each method is detailed below. In addition, the chart below compares the three options.
a. GED® is a test-based HSE option that measures skills required by high schools and requested by colleges and employers. The GED® consists of four subject area tests: (a) science, (b) social studies, (c) mathematical reasoning, and (d) reasoning through language arts. For more information about the GED®, please visit OAE’s website.

b. HiSET® is a test-based option that allows students to earn their HSE. The test is composed of five multiple subtests – Language Arts, Reading Language Arts, Writing, Mathematics, Science, and Social Studies) – which vary from 65 – 120 minutes. With the exception of an essay prompt on the Writing subtest, all subtests are exclusively multiple choice. For more information about the HiSET®, please visit OAE’s website.

c. Career Plus HSE allows Georgians ages 21 and older to earn a HSE while preparing for a career in a high-demand area. Students can combine high school credits and previously passed portions of the GED® or HiSET® with two technical college certificates, an Associate’s degree, or a diploma to earn their HSE. For more information about Career Plus HSE, please visit OAE’s website.

<table>
<thead>
<tr>
<th>Test Based Option</th>
<th>Online/At Home Test Option</th>
<th>Age Requirement</th>
<th>Recognized Outside of Georgia</th>
<th>Fee(s)*</th>
<th>Must Be a Georgia Resident</th>
</tr>
</thead>
<tbody>
<tr>
<td>GED®</td>
<td>Yes</td>
<td>Yes</td>
<td>18 or older 16 or 17 (must meet specific requirements)</td>
<td>Yes</td>
<td>$40 per subject $46/Online per subject</td>
</tr>
<tr>
<td>HiSET®</td>
<td>Yes</td>
<td>Yes</td>
<td>18 or older 16 or 17 (must meet specific requirements)</td>
<td>Yes</td>
<td>$26.75 per subject for in person test, $36.25 per subject for HiSET@Home</td>
</tr>
<tr>
<td>Career Plus HSE</td>
<td></td>
<td>21 or older</td>
<td></td>
<td>Varies</td>
<td>Yes</td>
</tr>
</tbody>
</table>

Adult Educations programs are encouraged to find other local funding sources which would provide financial assistance to test takers. As a reminder, Adult Education programs funded through AEFLA are unable to pay for HSE testing and/or HSE commencement ceremonies with federal or state funds.
III. Adult Education Grant Overview

Key Takeaways
- Adult Education grants are provided with federal Title II WIOA funds and state matching funds appropriated for adult education.
- OAE offers two grants: (a) General Adult Education Grants, and (b) Integrated English Literacy & Civics Education grants. Each grant has specific required and allowable activities.
- Grant-funded programs must serve eligible individuals as outlined in WIOA Section 203(4).
- Per WIOA 231, OAE provides grants through a competitive process. Grants are awarded for a four-year period and are subject to an annual renewal process.

A. Grant Overview
OAE provides two types of grants for adult education:

- General Adult Education Grants, comprised of federal Title II WIOA (Sections 231 & 225) funds, as well as state funds appropriated for adult education; and
- Integrated English Literacy & Civics Education (IELCE) Grants, provided with federal funds under Title II WIOA, Section 243.

Funds are awarded in accordance with their respective WIOA section, and are designated for specific purposes, as indicated in the chart below.

<table>
<thead>
<tr>
<th>Funding Stream</th>
<th>Required Activities Under Each Funding Stream</th>
<th>Allowable Activities Under Each Funding Stream</th>
</tr>
</thead>
</table>
| Federal General Adult Education (WIOA Section 231) | • Adult Basic Education & Adult Secondary Education AND/OR English Language Acquisition Activities  
• Integrated Education & Training (state requirement) | • Family Literacy  
• Workplace Literacy Activities |
| Federal Corrections Education (WIOA Section 225) | • Adult education for criminal offenders in correctional facilities and other institutionalized individuals | • Integrated Education & Training  
• Academic programs listed in 34 CFR § 463.60 |
State Matching Funds
- State matching funds can be used to support any of the activities listed above

### INTEGRATED ENGLISH LITERACY & CIVICS EDUCATION GRANTS

<table>
<thead>
<tr>
<th>Funding Stream</th>
<th>Required Activities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Federal IELCE (WIOA Section 243)</td>
<td>• Integrated English Literacy &amp; Civics Education in combination with Integrated Education &amp; Training</td>
</tr>
</tbody>
</table>

1. **Eligible Participants**

   Per WIOA, Section 203(4), AEFLA grant funds must be used to provide adult education and literacy activities to eligible individuals. Eligible individuals include:

   - Individuals who are at least 16 years old and are not enrolled or required to be enrolled in secondary school under State law; and who
   - Are basic skills deficient; or
   - Do not have a secondary school diploma or its recognized equivalent, and have not achieved an equivalent level of education; or
   - Are English language learners (even if they have degrees in their native countries).

   In addition, per [O.C.G.A. § 50-36-1](#), state agencies or political subdivisions must ensure that all individuals 18 years of age or older receiving adult education services submit a Verification of Eligibility for Public Benefit Form verifying that the individual is: (a) a United States citizen, (b) a legal permanent resident of the United States, or (c) a qualified alien or non-immigrant under the Federal Immigration and Nationality Act with an alien number issued by the Department of Homeland Security or other federal immigration agency.

2. **Grant Process**

   1. **Competitive Grant Process**

      Under WIOA Section 231, states are required to award adult education grant funds through a competitive process. Georgia awards competitive AEFLA grant funding on a four-year cycle.

      Georgia’s competitive grant application process requires applicants to submit the following items:
• Applicant Eligibility Screen to ensure the applicant is an eligible organization as outlined in WIOA 203(3), including that they have demonstrated effectiveness in serving adult learners; and
• Application that requires applicants to provide information that address the 13 considerations as outlined in WIOA Section 231(e), as well as information for OAE to conduct a pre-award risk assessment.

A team of reviewers scores each grant application. In addition, 34 CFR § 463.21, Local Workforce Development Board(s) review the applications of any applicants proposing to serve individuals within that Local Workforce Development Area (LWDA).

OAE uses the reviewer scores, the LWDB feedback, and the applicant’s risk assessment results, to make its final grant award determinations.

Please note, this process is subject to change in future years.

2. Annual Renewal Process
Once funded, adult education providers must submit a renewal application each spring. The renewal application contains information including, but not limited to: (a) an annual budget, (b) an analysis of the provider’s prior year performance, and (c) an overview of plans for the upcoming year. OAE will provide adult education programs more information about the annual renewal process, including the application specifics, each spring. Please note, OAE reserves the right to adjust each providers’ allocations based on their prior year’s enrollment, performance, and the availability of both state and federal funds.
IV. Adult Education Policies

Key Takeaways

- Grant funds must be used in accordance with all applicable federal and state regulations and policies, including provisions from the Uniform Grant Guidance, EDGAR and WIOA.
- All grant costs must be allowable, allocable, reasonable and necessary.
- Federal grant funds must be used to supplement, not supplant, other state or local funds.
- Per the Grant Award Notification, programs must submit monthly expenditure reports in Workiva.
- Per 2 CFR § 200.430, all employees paid in full or in part with federal or state matching grant funds must keep Time & Effort documentation and reconcile salary charges to match actual time worked in accordance with OAE’s Time & Effort procedures.
- All programs must have a staffing structure that incorporates the essential duties of adult education, including the duties of a program administrator, data manager, career service specialist, instructional lead, and instructors.
- Programs must align their adult basic education instruction with the Georgia Adult Education Curriculum and their English language acquisition instruction with the English Language Proficiency Standards.
- The state expects that, at a minimum, 80% of staff will meet these minimum professional development requirements during each fiscal year.
- The National Reporting System for Adult Education (NRS) is the outcome-based accountability system for State-administered, federally funded adult education program. OAE submits state-level data to the NRS each fall.

A. Fiscal Requirements

Local providers must ensure they spend their federal and state matching funds in accordance with all federal and state policies and regulations, as well as the terms and conditions of the Grant Award Notification letter (Appendix B). These regulations include, but are not limited to:

- The Uniform Grant Guidance;
- Education Department General Administrative Regulations; and
- WIOA.

The key requirements that local programs must be aware of are outlined below. However, please note, this manual is not exhaustive of every policy or regulation pertaining to AEFLA or state adult education grant funds.
1. **Allowable, Allocable, Reasonable & Necessary**

The Uniform Guidance, 2 CFR § 200.400, guides the use of federal grant funds. In accordance with the Uniform Guidance, all costs paid for with Title II AEFLA federal and state matching funds must be:

- **Allowable**, meaning the expense is not a prohibited use of federal or state funds and supports allowable activities under AEFLA. The Uniform Guidance (2 CFR §§ 200.420 - 200.475), as well as the chart below, provide additional details about what types of costs are an allowable use of federal and state dollars.

- **Reasonable & Necessary**, meaning a prudent person would agree that the cost of the item is reasonable given the circumstances, and that the cost is needed to effectively implement the grant activities. For example, paying an instructor $200,000 per year when the other instructors make $40,000 per year would not be reasonable. Similarly, hiring ten instructors to support a program that only serves 100 students would most likely not be reasonable or necessary.

- **Allocable**, meaning the cost is directly related to the grant activities (ex: you are paying for an adult education instructor salary) and that item’s cost is proportional to the benefit it will provide the program. For example, an instructor teaches adult education courses twice a week (40% of the time) and technical college courses three days a week (60% of the time). In this case, only 40% of that instructor’s salary is allocable and could be charged to the adult education grant.

The below chart also provides a list of allowable and unallowable adult education costs. Please note, however, that this chart is not inclusive of every allowable and unallowable expense. OAE reviews allowable expenses for reasonableness as well.

<table>
<thead>
<tr>
<th><strong>Allowable</strong></th>
<th><strong>Unallowable</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Adult education staff salaries</td>
<td>Alcohol</td>
</tr>
<tr>
<td>Assistive and adaptive equipment or special printed materials for adult education and literacy students with special learning needs.</td>
<td>Audit costs if the agency does not receive $750,000 or more per year in federal dollars</td>
</tr>
<tr>
<td>Audit costs for agencies that receive $750,000 or more each year in federal dollars</td>
<td>Food for conferences or meetings the organization is hosting</td>
</tr>
<tr>
<td>Course supplies and materials</td>
<td>Beverages of any kind including water cooler rental</td>
</tr>
<tr>
<td>Computers, supplies, and equipment for adult education staff or students</td>
<td>Ceremonies, commencement, and convocation costs</td>
</tr>
<tr>
<td>Indirect Costs (requires a negotiated indirect cost rate)</td>
<td></td>
</tr>
</tbody>
</table>

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- IET costs, including the cost of certifications and credentials required to implement the components for an IET per 34 CFR § 463.36 and up to $10,000 per year in training costs (state-imposed restriction)
- Learning software
- Outreach activities (newspapers, radio, TV, magazines) related to recruiting adult education students or teachers (requires prior approval by OAE)
- One-stop infrastructure costs
- Rent and utilities for buildings where classes and adult education activities occur (provided that the amount paid out of the grant is allocable and can be determined by a reasonable, documented method)
- Test preparation materials
- Travel (mileage, lodging, per diem) for adult education activities (course observation, professional development, etc.) or professional development in alignment with the state of Georgia travel guidelines
- The cost of GED or HiSET testing
- Entertainment
- Expenses unrelated to adult education programming or objectives
- Gifts, door prizes, rewards, and promotional materials or “swag” (t-shirts, pens, cups, key chains, book bags)
- Marketing expenses to promote the organization as a whole rather than the adult education program

### 2. Supplement not Supplant

Section 241 of WIOA specifies that Title II AEFLA funds must be used “to supplement and not supplant other state or local funds expended for adult education and literacy activities.” Supplanting occurs when an organization deliberately reduces state or local funds because it receives federal funds. A good test to determine whether or not your program is supplanting is to ask: “What would happen to this cost if our program did not receive federal funds?” If the answer to that question is that the state or local funds would support that cost, then the program is likely supplanting. For more information regarding the supplement not supplant provision please see OAE Memo 20.5.7.

### 3. WIOA Set Asides

Under WIOA, federal adult education funds are subject to certain set-asides and requirements. One such set aside is:
- Local Administrative Cost Limit (WIOA Section 233): Local programs must expend no more than 5% of their grant award for administrative costs. The 5% administrative cost limit applies to 231/225 grants and IELCE grants separately. More information regarding programmatic and administrative costs is available in the **Administrative vs. Programmatic Costs** section of this manual.
4. Administrative vs. Programmatic Costs
Per section 233 of WIOA, all local programs, including IELCE programs, must spend at least 95% of grant funds on programmatic costs and no more than 5% on administrative costs. OAE has adopted this same restriction and requires that programs spend no more than 5% of their federal and state matching funds on administrative costs.

However, in cases where the 5% administrative cost limit is too restrictive, funded programs can negotiate a higher administrative cost limit by submitting an administrative cost limit waiver. Please note, OAE will only grant a waiver in instances where the applicant can prove that the higher administrative cost limit is absolutely necessary to their program’s ability to meet the grant requirements and positively impact students.

Per 34 CFR § 463.26, the following activities are considered local administrative costs:

- Planning;
- Administration, including carrying out performance accountability requirements;
- Professional development;
- 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; and
- Carrying out the one-stop partner responsibilities described in 34 CFR § 463.420, including contributing to the infrastructure costs of the one-stop delivery system.

In general, administrative costs are non-instructional costs that do not directly touch students. Programmatic costs are instructional costs that directly touch students. The below chart provides additional detail regarding what types of costs are programmatic or administrative costs. However, please note this list is not inclusive of every possible programmatic or administrative cost.
### Programmatic vs. Administrative Costs

<table>
<thead>
<tr>
<th>Programmatic Costs</th>
<th>Administrative Costs</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Instructor, instructional lead, and instructional aide salaries</td>
<td>• Indirect costs (requires a negotiated indirect cost rate)</td>
</tr>
<tr>
<td>• Career services/transition coordinator salary</td>
<td>• Planning (budgeting, writing grant renewal applications, or other clerical/bookkeeping work)</td>
</tr>
<tr>
<td>• Career services events and supplies</td>
<td>• Salary related to data entry</td>
</tr>
<tr>
<td>• Student course materials and equipment (books, laptops, etc.)</td>
<td>• One-stop infrastructure costs</td>
</tr>
<tr>
<td>• Instructor equipment and supplies</td>
<td>• Professional development</td>
</tr>
<tr>
<td>• Rent and utilities for buildings where classes are held</td>
<td>• Rent and utilities for buildings that house administrative staff</td>
</tr>
<tr>
<td>• Program administrator salary <em>(portion that includes creating instructional tools, data analysis, conducting instructional observations, conducting intake or orientation or working with students)</em></td>
<td></td>
</tr>
<tr>
<td>• Salary for staff members that conduct intake, orientation, or provide other support directly to students</td>
<td></td>
</tr>
<tr>
<td>• Coordinating strategic partnerships with community organizations</td>
<td></td>
</tr>
</tbody>
</table>

### 5. Indirect vs. Direct Costs

Indirect costs are agency-wide costs that are not directly and easily attributable to one program or initiative. Direct Costs are costs that directly relate to and are easily attributable to one program or initiative. Please note, that there is no firm rule as to whether a cost is always considered direct or indirect. However, examples of possible direct and indirect costs include, but are not limited to:

<table>
<thead>
<tr>
<th>Indirect Costs</th>
<th>Direct Costs</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Utility costs for a campus building that includes classroom space used for adult education courses and technical college courses, as well as a student center</td>
<td>• Professional development trainings and conferences for adult education teachers</td>
</tr>
<tr>
<td>• Salary for accounting staff that support a whole technical college or school district, including the adult education program</td>
<td>• The salary of adult education staff and instructors</td>
</tr>
<tr>
<td>• The cost of accounting software used by the entire agency</td>
<td>• Rent for off-campus or non-agency buildings that are only used by the grantee for adult education courses</td>
</tr>
<tr>
<td></td>
<td>• A contract for GED preparation software</td>
</tr>
</tbody>
</table>
Per 34 CFR § 76.563, programs wishing to charge indirect costs to their AEFLA federal grant funds are subject to a restricted indirect cost rate. To charge indirect costs to AEFLA grant funds, programs must either:

- Have a current indirect cost rate agreement, which includes a restricted indirect cost rate, with their cognizant federal agency or another pass-through entity,¹ or
- If they do not have a current indirect cost rate agreement, negotiate an indirect cost rate with OAE.

Please note, that it is not allowable to charge indirect costs as direct costs to federal grant funds. Similarly, it is not allowable to charge something as a direct cost to your grant (ex: rent) if it is included in your indirect cost rate per the indirect cost rate agreement under this award or another federal award.

6. Period of Availability of Federal and State Funds
Both Federal and State funds are provided for the one-year period of performance indicated in your official Grant Award Notification (see Appendix B) (ex: July 1, 2022 – June 30, 2023). As a reminder, all State funds must be obligated by the end of the program year.

Per 2 CFR § 200.343 and the Grant Award Notification, programs must liquidate all obligations incurred during the period of performance within 90 days of the end of the period of availability.

7. Obligating vs. Liquidating Funds
An obligation is an order placed for property and services, contracts and subawards made, and similar transactions during a given period that require payment during the same or future period (2 CFR § 200.71). Liquidation occurs when the property is received, the service is performed, or a contract is fulfilled. The chart below shows when something is considered obligated (34 CFR § 76.707).

<table>
<thead>
<tr>
<th>Item Type</th>
<th>Obligated When . .</th>
</tr>
</thead>
<tbody>
<tr>
<td>Acquisition of Property</td>
<td>On the date which the subrecipient makes a binding written commitment to acquire the property</td>
</tr>
<tr>
<td>Personal Services by an Employee</td>
<td>When the services are performed</td>
</tr>
</tbody>
</table>

¹ A cognizant agency is the federal agency from which an organization receives the most federal funding. For example, a nonprofit organization receives $2 million annually from U.S. Department of Health and Human Services, and $1 million annually from the U.S. Department of Education. In this case, the U.S. Department of Health and Human Services would be the organization’s cognizant agency.
8. Reimbursement Process
OAE provides AEFLA and state matching grant funds on a monthly reimbursement basis, meaning that subrecipients must liquidate the funds prior to requesting reimbursement. The reimbursement request (either the cash draw for TCSG entities or a funds requisition request for non-TCSG entities) is due on the 15th of the month for the prior month’s expenses, unless otherwise specified. For example, by August 15th, programs would submit the reimbursement request for July expense. Each month, subrecipients must follow the below procedures for requesting reimbursement:

For Technical Colleges:
Technical Colleges must request reimbursement by submitting a cash draw according to TCSG’s cash draw schedule.

For School Districts, Nonprofits, and Other Organizations:
Non-TCSG entities will request reimbursement by submitting a funds requisition request to LaShelle White at lwhite@tcsg.edu. The funds requisition request form is available on OAE’s Program Management website under the “Budget Forms & Guidance” dropdown.

9. Budget & Project Amendment Process
Per 2 CFR § 200.308, OAE requires programs make budget and project amendments under the following circumstances:

Programs must make a budget amendment when . . .
- The program is requesting to move more than $1,000 between line items within the same budget section/cost objective (231 Admin, 231 Program, 225 Admin, 225 Program, 243 Admin, 243 Program, State Admin, State Program)
- The program is requesting to move money between budget sections (231 Admin, 231 Program, 225 Admin, 225 Program, etc.) or into or out of payroll even if you are moving less than $1,000; or
- The program is requesting additional funds.

Programs must make a project amendment (even if there are no associated budget amendments) when:

---

**Personal Services by Contractor**  |  On the date which the subrecipient makes a binding written commitment to obtain the services
---|---
**Travel**  |  When the travel is taken
**Rental of real or personal property**  |  When the subrecipient uses the property
• The program is making a significant change to the scope of its work (ex: implementing a new IET, opening a new site),
• There is a change in program leadership or key personnel which includes personnel pay increases (ex: program administrator, lead instructor, etc.),
• The program administrator decreases the amount of time he or she spends on the project by more than 25%.

Programs can make a budget or project amendment by submitting a completed budget and project amendment form to OAEamend@tcsg.edu.

The budget and project amendment form is available on OAE’s Program Management website under the Budget Forms & Guidance Dropdown. For more information about the budget amendment process, please read the Budget & Project Amendment Information & FAQs.

10. Workiva Financial Tracking
Per the Grant Award Notification (see Appendix B), all adult education programs are required to enter their approved budget, monthly expenditures, and inventory into Workiva. Workiva entries are due by the last day of the month for the previous month’s expenditures. For example, Workiva reporting for August expenditures and inventory would be due on September 30th. For more information regarding Workiva financial tracking, please view the Monthly and Quarterly Financial Procedures as well as this webinar.

B. Additional Requirements

1. Equipment, Supplies & Inventory
Equipment refers to any item over $5,000 in value with a useful life of more than one year. Supplies are items less than $5,000 not included in the definition of equipment, including computing devices (2 CFR § 200.94). All subrecipients must maintain equipment purchased with federal or state grant funds in accordance with 2 CFR § 200.313. These requirements include:

• Maintaining appropriate inventory records of both equipment and “pilferable” supplies, such as computing devices, (Please note: programs must enter all equipment into their Workiva inventory list, which meets the record requirements outlined in 2 CFR § 200.313(d)(1));
• Taking a physical inventory of equipment every two years;
• Putting in place internal controls to safeguard equipment against loss, damage, or theft; and
• Investigating any loss, damage, or theft to property.

Participants must ensure that they also dispose of equipment and supplies in accordance with the requirements outlined in 2 CFR § 200.313(e).
2. **Procurement**
Per 2 CFR § 200.317, state agencies must follow the same policies and procedures it uses for procurements from its non-federal funds. The state procurement guidelines are available here. All other subrecipients must follow the general procurement standards outlined in sections 2 CFR § 200.318 - §200.326 of the Uniform Guidance. All subrecipients must ensure that they have documented, written procurement procedures as established by the governing authority of the organization.

3. **Record Retention**
Per 2 CFR §200.334 and 34 CFR 81.32 subrecipients must retain all grant-related documentation, including financial records and supporting documentation, student records, and other programmatic records, for a period of five years from the date of the final annual fiscal report. For example, if a program submits their final annual fiscal report on September 30, 2020, they must retain all grant records until September 30, 2025. However, please note the following exceptions to this rule:

- If any litigation, claim, or audit is started before the end of the record retention period, then the subrecipient must retain the records until any litigation, claims or audit findings have been resolved and the final action has been taken.
- A program must retain records for real property or equipment acquired with grant funds for a period of five years after the final disposition.

Per 2 CFR § 200.335, programs may maintain electronic records provided that they remain readable and cannot be altered.

4. **Time & Effort**
All employees paid in full or in part with adult education federal or state matching funds must keep Time & Effort documentation (2 CFR § 200.430). There are two types of time and effort certifications: Time and Effort Semi-Annual Certifications and Time and Effort Work Activity Reports. The specific type of time and effort certification an employee will complete depends on if they are paid from one or multiple funding sources and if their work supports one or multiple cost objectives. The OAE’s Time & Effort Policy & Procedures manual provides further information regarding the required time and effort documentation, as well as which employees need to complete which type of documentation.

Budget estimates or other distribution percentages determined before the services are performed do not qualify as support for charges to federal awards. Therefore, if the percentage of time reported for a specific federal project or cost objective differs from the original estimate, the salary charges must be reconciled to match the actual reported time. This reconciliation must occur at least quarterly, and if actual effort significantly deviates from original budgeted time, the supervisor must redirect the effort of the employees or seek a budget amendment.
5. Travel

Per 2 CFR § 200.474, travel costs for activities necessary for the adult education grant, such as travel to conferences or training, are allowable provided that the travel costs are: (a) reasonable and necessary, (b) reimbursed according to the subrecipient’s written travel policy, and (c) consistent with how travel costs would be reimbursed for non-federal activities. Please note that all subrecipients must have a written travel policy that complies with the provisions of 2 CFR § 200.474. State of Georgia agencies must follow the state travel policy, which is available here.

Please note, OAE requires prior approval for adult education program staff that want to travel out of state for conferences or training. To request approval to travel out of state, please complete the Out of State Travel Form. Email completed Out of State Travel Forms to Ms. Rachelle Taylor (rtaylor@tcsg.edu) for approval prior to out of state travel.
C. Programmatic Requirements

1. Instructional Activities

Under WIOA, there are several allowable instructional activities, including (a) adult basic education, (b) corrections education, (b) English language acquisition, (c) family literacy, (d) integrated education and training (IET), (e) integrated English literacy & civics education (IELCE), and (f) workforce preparation activities. Programs may offer these activities through multiple delivery methods, including in-person, distance education, and a hybrid approach. Please note, OAE requires all programs to offer distance learning options through Blackboard. The chart below specifies which activities are required or allowable based on the type of grant and funding streams the program receives.

### General Adult Education Grants

<table>
<thead>
<tr>
<th>Funding Stream</th>
<th>Required Activities Under Each Funding Stream</th>
<th>Allowable Activities Under Each Funding Stream</th>
</tr>
</thead>
</table>
| **Federal General Adult Education (WIOA Section 231)** | • Adult Basic Education & Adult Secondary Education AND/OR English Language Acquisition Activities  
• Integrated Education & Training (state requirement)  
• Distance Education through Blackboard | • Family Literacy  
• Workplace Literacy Activities |
| **Federal Corrections Education (WIOA Section 225)** | • Adult education for criminal offenders in correctional facilities and other institutionalized individuals | • Integrated Education & Training  
• Academic programs listed in 34 CFR § 463.60 |
| **State Matching Funds** | • State matching funds can be used to support any of the activities listed above | |

### Integrated English Literacy & Civics Education Grants

<table>
<thead>
<tr>
<th>Funding Stream</th>
<th>Required Activities</th>
</tr>
</thead>
</table>
| **Federal IELCE (WIOA Section 243)** | • Integrated English Literacy & Civics Education in combination with Integrated Education & Training  
• Distance Education through Blackboard | • Family Literacy (Please note: family literacy grants for IELCE providers may be funded through philanthropic or other funds). |
a. Adult Basic Education & Adult Secondary Education

Adult Basic & Secondary Education is academic instruction and services below the postsecondary level that increases an individual’s ability to: (a) read, write, and speak in English and perform mathematics or other activities necessary for the attainment of a secondary school diploma or its recognized equivalent; (b) transition to postsecondary education and training, or (c) obtain employment (WIOA Section 203(1)). Adult Basic Education refers to instruction eighth grade level and below, and Adult Secondary Education refers to instruction between the ninth and twelfth grade levels.

To learn more, view the What is Adult Education? Webinar.

b. Corrections Education

Corrections Education is adult education instruction for individuals in correctional facilities including prison, jails, reformatories, work farms, detention centers, halfway houses, rehabilitation centers, or any other institution designed to rehabilitate criminal offenders. Corrections education should be geared towards individuals scheduled to be released within five years and designed to prepare participants to transition back successfully and permanently into the community. Activities can include special education, opportunities for participants to get secondary school credit or earn a high school equivalency, career pathways (including integrated education and training), peer tutoring, and other activities with the goal of a successful re-entry into the community. Funding for corrections education is provided under Section 225 of WIOA. (34 CFR § 463.60, 463.62, & 463.63). Please note, programs cannot use AEFLA federal and state matching funds to operate HSE testing centers in correctional facilities. Rather, programs must use the funds to prepare students to obtain their HSE.

To learn more, view the What is Corrections Education? Webinar.

c. English Language Acquisition Programs

English Language Acquisition Programs provide instruction and adult education services for English language learners to achieve competence in reading, writing, speaking and comprehension of the English language that leads to: (a) the attainment of a secondary school diploma or high school equivalency; (b) transition to postsecondary education and training; or (c) employment (34 CFR § 463.31). Specifically, per 34 CFR § 463.32, English Language Acquisition Programs must:
   o Align their instruction to the English Language Proficiency Standards (ELPS).
   o Offer educational and career counseling services that assist an eligible individual to transition to postsecondary education or employment; or
   o Be part of a career pathway.

To learn more, view the What is an English Language Acquisition Program? Webinar.
d. Family Literacy
Family literacy programs aim to make sustainable improvements in the economic prospects for a family and better enable parents or family members to support their children’s learning needs. Per WIOA Section 203(9), family literacy programs integrate the following four components:
  o Adult education activities that prepare parents or caregivers to transition into postsecondary education, training programs or the workforce;
  o Interactive literacy activities between parents and caregivers and their children;
  o Training activities that support parents and caregivers in becoming their children’s first teachers and full partners in their children’s education; and
  o Age-appropriate education that prepares children for success in school and beyond (ex: mentoring, tutoring, etc.).

In addition, OAE has set the following requirements for family literacy:
  o Children ages birth to thirteen can participate in the family literacy program provided that they are the children of family members or caregivers receiving adult education services; and
  o Children in the program must participate for a minimum of twelve hours.

To learn more, view the What is Family Literacy? Webinar.

Programs can request up to $8,000 to support the implementation of a family literacy program. However, per section 231(d) of WIOA programs implementing family literacy programs must attempt to coordinate (and have documentation of these attempts) with other programs to provide services directly to children who are not considered eligible individuals under WIOA, prior to expending Title II AEFLA funds on activities directly for children.

e. Integrated Education & Training
Per the Grant Award Notification (Appendix B), OAE requires all providers to offer at least one Integrated Education & Training (IET) opportunity for students per quarter. IET is 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. (34 CFR § 463.35). All IETs must:

  • Integrate: (a) adult education and literacy activities as described in § 463.30; (b) workforce preparation activities as described in § 463.34; and (c) workforce training for a specific occupation or occupational cluster which can be any one of the training services defined in WIOA section 134(c)(3)(D);
• Prepare students for a career in a specific occupation or occupational cluster that is aligned with a regionally in-demand industry;
• Support students eligible to receive AEFLA services under WIOA Section 203(4);
• Be aligned with the CCRS and/or ELPS and utilize a Single Set of Learning Objectives (SSLOs) that includes objectives for adult education, workforce training, and workforce preparation.

Programs must submit the IET Approval Form to their GPSC for approval prior to starting the IET. See OAE’s IET webpage for more information and resources.

To learn more, view the What is Integrated Education & Training? Webinar.

Programs may use their AEFLA federal and state matching grant funds to support IET, including up to $10,000 for training costs (state requirement).² If a program wishes to expend more than $10,000 for training costs, they must submit a letter to OAE outlining: (a) the IET they would like to fund, (b) the amount they are requesting to use, including the cost per student, and (c) other funding sources they have pursued and why those funding sources did not work out.

Given the costs associated with IET and the limited availability of grant funds, programs may also need to find alternate funding sources to support IET, particularly training costs for students. Potential funding sources, include but are not limited to:

• The Hope Career Grant;
• Ability to Benefit;
• Local Workforce Development Boards (Individual Training Accounts for eligible students); and
• Other outside funding sources, such as foundation or industry grants.

As a reminder, per WIOA Section 241(a) local programs must use AEFLA grant funds to supplement not supplant other state or local funds. This provision means that if a program desires to use AEFLA grant funds for training or IET costs previously paid by other local or state funds, they must ensure they have documentation to support that the program is not supplanting (OAE Memo 20.5.7).

² OCTAE Program Memo 19-2
f. Integrated English Literacy & Civics Education (IELCE)
IELCE, funded through a separate grant under WIOA Section 243, is instruction for adult English language learners, including professionals with degrees and credentials in their native countries, which provides them the English and other skills needed to function effectively as parents, workers, and to obtain United States citizenships. IELCE programs must include:
- English language instruction,
- Instruction on the rights and responsibilities of citizenship and civics participation; and
- Integrated education & training. (34 CFR § 463.33)

To learn more, view the What is Integrated English Literacy & Civics Education? Webinar.

g. Workplace Literacy
Workplace Literacy (WPL), as defined in Section 203 of WIOA, are activities offered by an eligible provider in collaboration with an employer or employee organization at a workplace or an off-site location designed to improve the productivity of the workforce. Learn more about Workplace Literacy classes.

2. Distance Education
OAE requires that all adult education providers offer distance education to students. Distance education is a formal learning activity where students and instructors are separated by geography, time, or both for the majority of the instructional period. Students can participate in and receive hours for any of the following distance education models:

- The Clock Time Model assigns contact hours based on the elapsed time that a learner is connected to, or engaged in, an online or stand-alone software program that tracks time.

- The Learner Mastery Model assigns a fixed number of hours of credit based on the learner passing a test on the content of each lesson. Learners work with the curriculum and materials, and when they feel they have mastered the material, take a test. A high percentage of correct answers (typically 70%-80%) earns the credit hours attached to the assignment.

- The Teacher Verification Model assigns a fixed number of hours of credit for each assignment based on teacher determination of the extent to which a learner engaged in, or completed, the assignment.

Please note, that all students engaged in distance learning still must be pre- and post-tested in accordance with OAE’s assessment policy for distance learners. For more information regarding the allowable distance education models, as well as the assessing distance learners, please read Appendix B of OAE’s assessment policy.

TCSG Office of Adult Education Policy & Procedure Manual
a. Blackboard
OAE has purchased Blackboard for use by all adult education providers, including organizations outside of the technical college system. OAE requires that providers offer some portion of their Distance Education program through Blackboard, although they may choose to use other platforms, such as Webex. Blackboard allows adult education programs to offer synchronous adult education classes through Blackboard Collaborate, as well as asynchronous classes by building courses in the system.

3. Instructional Standards
a. Georgia Adult Education Curriculum
OAE requires adult education programs teaching adult basic education to align their instruction to the Georgia Adult Education Curriculum Framework.

b. English Language Proficiency Standards for Adult Education
OAE requires adult education programs teaching English language learners to align their instruction to the English Language Proficiency Standards for Adult Education.

4. Assessment
To meet NRS requirements, programs must administer the appropriate pre and posttest NRS assessments to students. The policies and procedures for assessing students are detailed in OAE’s assessment policy.

5. Student Intake
The intake process is critical to ensuring programs collect accurate data needed for NRS reporting and state eligibility requirements. The steps and requirements for intake are outlined below.

- **Step 1: Students complete the online Student Registration Form.** Students can complete this process on their own or with the help of an adult education staff member. All data entered into the Student Registration Form is available to transfer into GALIS. Programs must review with the student and ensure all required data elements are complete and accurate before transferring data into GALIS.

  [Click here for a webinar walkthrough of the online Student Registration Form.](#)

  [Click here for a webinar on how to transfer data from the Student Registration Form into GALIS.](#)

- **Step 2: Verify Eligibility:** Once a student completes the Student Registration Form, programs must ensure that a student is eligible to enroll in the adult education program per both state and federal guidelines. As a reminder, WIOA Section 203(4) outlines who is an eligible AEFLA participant. Eligible individuals include:
Individuals who are at least 16 years old and are not enrolled or required to be enrolled in secondary school under State law; and who—

- Are basic skills deficient; or
- Do not have a secondary school diploma or its recognized equivalent, and have not achieved an equivalent level of education; or
- Are English language learners (even if they have degrees in their native countries).

In addition, programs must ensure they collect the following paperwork from student as applicable:

- **Verification of Eligibility for Public Benefit Form:** Per O.C.G.A-36-1-50-36-1, state agencies or political subdivisions must ensure that all individuals 18 years of age or older receiving adult education services submit a Verification of Eligibility for Public Benefit Form. This form verifies that the individual is: (a) a United States citizen, (b) a legal permanent resident of the United States, or (c) a qualified alien or non-immigrant under the Federal Immigration and Nationality Act with an alien number issued by the Department of Homeland Security or other federal immigration agency. Please note this form must be notarized.

- **Underage Youth Application Form** (for 16- or 17-year-old students): Instructions for how to complete this packet are available on our Data Management page.

- **Step 3:** **Complete Student Goals and Signature Page:** Adult education staff, along with the student, should complete the Student Goals & Signature page. Both students and staff must sign this form and retain a copy in the student’s file.

- **Step 4:** **Conduct the appropriate NRS Assessment.** Once a program verifies a student is eligible, the student must take the appropriate NRS assessment(s) to determine their Educational Functioning Level. For more information regarding administering the appropriate NRS pre-assessment, please view OAE’s assessment policy.

6. **Local Program Staffing Requirements**
To ensure that all programs have the staff needed to operate an effective adult education program, OAE requires each program to have staff or volunteers that fulfill the essential job duties listed in the Local Program Essential Job Duties Chart below. Please note that although the table designates specific position names for each of the essential job duties, programs are not required to use this exact staffing structure. For example, a program may hire one full time person that fulfills the duties of a data manager and a career services specialist. Similarly, a smaller program may have a program administrator that also serves as the instructional lead. Programs are required, however, to ensure that there is a designated staff person or volunteer that
will fulfill each of the essential duties and minimum time requirements outlined in the chart below.

a. Other Positions
The Local Program Essential Job Duties Chart is a minimum, not exhaustive, list of the essential duties OAE believes are needed to operate a successful adult education program. OAE recognizes that the needs of students and programs across the state vary widely and that programs may need to hire additional staff to fill critical, program-specific roles. Programs wishing to hire staff for program-specific positions need to ensure that: (a) the job is allocable to the adult education program; and (b) the cost of the salary is proportionate to the amount of time that staff person spends on adult education activities.

b. Split-Funded Positions
It is allowable for program staff who work on the adult education program to work on other programs or initiatives within their organization, as long as adult education grant funds only pay for the amount of time those staff members spend on allowable adult education activities. Programs wishing to split-fund positions need to have reasonable, documented methods (such as a job description with estimated FTEs by project) for how they determined the amount of that person’s salary paid out of adult education grant funds. Programs will need to ensure all split-funded staff maintain federally and state-compliant time and effort reports in accordance with OAE’s Time & Effort Policy, and that they are paid for actual time worked rather than budget estimates.
<table>
<thead>
<tr>
<th>Position</th>
<th>Essential Job Duties</th>
<th>Minimum Required FTE and/or salary (state requirement)</th>
<th>Minimum Qualifications (state requirement)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Program Administrator</td>
<td>• Serves as the main liaison between OAE and the local program</td>
<td>30 hours per week, unless the program has an approved waiver from OAE</td>
<td>Degree from a four-year college or university</td>
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<td></td>
<td>• Serves as the primary program leader, responsible for building the capacity of staff through differentiated supervision, coaching, and evidence-based evaluation</td>
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<td></td>
<td>• Fosters partnerships with WIOA core partners, local community organizations and the program’s LWDB(s) and local one-stop(s)</td>
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<td></td>
<td>• Manages the adult education program budget in partnership with the organization’s fiscal staff</td>
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<td></td>
<td>• Ensures compliance with all applicable state and federal laws and policies, including the Uniform Guidance, EDGAR and those regarding intake, assessment, and data</td>
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<tr>
<td></td>
<td>• Continuously uses program data to identify and address areas for program improvement</td>
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<tr>
<td>Data Coordinator</td>
<td>• Conducts regular data audits to verify the validity and accuracy of program data</td>
<td>Varies based on the need and size of the program</td>
<td>A high school diploma or equivalent</td>
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<td></td>
<td>• Enters student and instructor data into GALIS and/or oversees data entry activities</td>
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<td></td>
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<td></td>
<td>• Trains new instructors and program staff on state and program-specific data policies and procedures</td>
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<td></td>
</tr>
<tr>
<td></td>
<td>• Regularly analyzes data to identify areas for program improvement</td>
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<td></td>
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<tr>
<td></td>
<td>• Ensures all program staff are in compliance with state and program-specific data policies and procedures</td>
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<tr>
<td>Transition/Career Services Specialist</td>
<td>• Develops and implements strategies to recruit and retain students</td>
<td>Varies based on the need and size of the program</td>
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<td></td>
<td>• Supports the intake process</td>
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<tr>
<td></td>
<td>• Forges relationships with local education, training, and social service organizations that enable students to successfully transition into postsecondary education or the workforce</td>
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<tr>
<td></td>
<td>• Connects students with wraparound services</td>
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</table>
| Instructional Lead | Guides and coaches students on potential postsecondary and career pathways  
|                   | Fosters students’ self-efficacy and persistence in reaching their academic and career goals through regular communication and goal setting |
|                   | Plans and delivers professional development to ensure all instructors are implementing evidence-based instructional strategies that lead to student achievement  
|                   | Ensures instructors are implementing high-quality, evidence-based instructional strategies that lead to positive student outcomes  
|                   | Provides tailored training and support to instructors as needed  
|                   | Mentors and provides technical assistance related to program goals and objectives  
|                   | Ensures the program offers instruction through a variety of delivery methods (in person, online, one on one, etc.) that meet all students’ needs, including those with disabilities |
|                    | Varies based on the needs and size of the program  
|                    | Degree from a four-year college or university |
| Instructors (both full time and part time) | Plans and delivers high-quality, evidence-based instruction that leads to positive student outcomes  
|                                               | Differentiates instructional methods to ensure they meet all students’ needs, including those with disabilities  
|                                               | Develops targeted plans of instruction for students |
|                                               | Varies based on the needs and size of the program  
|                                               | Part time instructors must receive a minimum of $20 per hour  
|                                               | Degree from a four-year college or university |

7. **Professional Development**

All program staff are expected to attend state-sponsored professional development. Per state requirement, the subrecipient will provide local professional development for staff and faculty and ensure participation in state-provided professional development and meetings as the Technical College System of Georgia deems appropriate or mandatory. The subrecipient agrees to comply with the established professional development minimum hour requirements for all program personnel as outlined below, which includes: (a) at least 24 professional development hours for the program administrator, and full-time instructors, faculty, and staff, and (b) a minimum of 12 hours for part time instructors, faculty and staff. Staff should participate in Professional Development opportunities, whether local or state-provided, at minimum, each
quarter. Local Professional Development opportunities must be entered into GALIS within 30 days of the PD opportunity.

- Program Administrators are required to complete a minimum of 24 hours of professional development (8 hours in Instructional Leadership/Grant Management). They are also required to attend the annual Operations meeting and the four Program Administrator Meetings.
- Lead instructors are required to complete a minimum of 12 hours (FT)/6 hours (PT) of targeted transition focused offered by OAE.
- Career Services Specialists are required to complete a minimum of 12 (FT)/6 hours (PT) of targeted data focused training offered by OAE.
- Data Managers (FT and PT) are required to complete a minimum of 6 hours of targeted data focused training offered by the OAE.
- Instructors are required to attend a minimum of 12 hours of OAE-sponsored training if full time and 6 hours if part time.

OAE expects that, at a minimum, 80% of staff will meet these minimum professional development requirements during each fiscal year.

Additional professional development may be necessary and required by the program or institution for those specializing in specific areas.

OAE sponsored professional development sessions include (face to face, online, or blended):
- College and Career Readiness Standards/English Language Proficiency Standards (CCRS/ELPS)
- Student Achievement in Reading (STAR Reading)
- Integrated Education and Training (IET)
- Core Instructional Strategies for HSE (GED/HiSET)
- Mathematics
- English Language Arts
- Science
- Social Studies
- Technology Utilization and Integration
- Technically Speaking
- NRS & Data focused training
- Assessment Policy/Assessment Related training

Please note, programs may use funding to attend other professional development opportunities, such as national conferences. Professional development hours acquired from attending out of

TCSG Office of Adult Education Policy & Procedure Manual
state or national conferences or events **will not count** towards the PD hour calculation. Professional development costs must be included as part of the budget in addition to the funding reserved for OAE-sponsored professional development. As a reminder, all professional development is considered an administrative cost and is subject to the five percent administrative cost limit (WIOA Section 233).

8. Data Management

a. National Reporting System (NRS) for Adult Education

The National Reporting System for Adult Education (NRS) is an outcome-based accountability system for the State-administered, federally funded adult education program. Developed by the U.S. Department of Education's Division of Adult Education and Literacy (DAEL), the NRS enables states and the U.S. Department of Education to gather and report on national outcomes for adult education.

Each October, OAE submits a report to the NRS on Georgia’s state-level outcomes related to the six WIOA performance indicators:

<table>
<thead>
<tr>
<th></th>
<th>Description</th>
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<tbody>
<tr>
<td>1</td>
<td>The percentage of <strong>participants</strong> who are in unsubsidized employment during the second quarter after exit from the program</td>
</tr>
<tr>
<td>2</td>
<td>The percentage of <strong>participants</strong> who are in unsubsidized employment during the fourth quarter after exit from the program</td>
</tr>
<tr>
<td>3</td>
<td>Median earnings of <strong>participants</strong> who are in unsubsidized employment during the second quarter after exit from the program</td>
</tr>
<tr>
<td>4a</td>
<td>The percentage of those <strong>participants</strong> enrolled in an education or training program (excluding those in on-the-job training [OJT] and customized training) who attained a <strong>recognized postsecondary credential</strong> or a <strong>secondary school</strong> diploma, or its recognized equivalent, during participation in or within 1 year after exit from the program.</td>
</tr>
<tr>
<td>4b</td>
<td>A <strong>participant</strong> who has attained a <strong>secondary school</strong> diploma or its recognized equivalent is included in the percentage of <strong>participants</strong> who have attained a <strong>secondary school</strong> diploma or recognized equivalent only if the <strong>participant</strong> also is employed or is enrolled in an education or training program leading to a <strong>recognized postsecondary credential</strong> within 1 year after exit from the program.</td>
</tr>
<tr>
<td>5</td>
<td>The percentage of <strong>participants</strong> who, during a program year, are in an education or training program that leads to a <strong>recognized postsecondary credential</strong> or employment and who are achieving measurable skill gains, defined as documented academic, technical, occupational, or other forms of progress, towards such a credential or employment.</td>
</tr>
<tr>
<td>6</td>
<td>Effectiveness in serving employers.</td>
</tr>
</tbody>
</table>

More information related to the NRS is available on OCTAE’s website and the in the NRS Technical Assistance Guide.
b. Georgia’s Adult Learner Information System (GALIS)
In accordance with Section 116(i) of WIOA, OAE has developed GALIS (Georgia Adult Learners Information System) as the electronic student and data information system. Per OAE requirement, all programs receiving an adult education grant are required to enter student and instructor data into GALIS.

Local programs must follow these GALIS data entry requirements:
- Enter all NRS-approved assessment scores into GALIS within 10 business days of assessment administration.
- Enter student attendance hours into GALIS within 5 business days.

GALIS also allows programs to run local reports that help the program measure its progress towards its outcome targets.
V. Accountability

Key Takeaways

- OAE negotiates its statewide performance targets for the primary indicators of performance with OCTAE. In turn, OAE then negotiates local performance targets with each of its programs.
- Per 2.CFR § 200.332, OAE, as a pass-through entity of federal funds is required to monitor its programs. To do this, OAE conducts desktop monitoring and on-site monitoring visits.
- If a grant program is out of compliance, OAE will take appropriate action to remedy the situation which can include: (a) providing additional technical assistance, (b) placing the program on special conditions or a corrective action plan, (c) withholding grant funds, or (d) terminating the grant.
- Subrecipients may request a hearing to appeal any action OAE takes to remedy noncompliance.

A. Performance

Under WIOA 116, each core partner is required to collect and report data related to the six primary indicators of performance (20 CFR § 677.155). These performance indicators, their respective data collection methods, and the local program’s responsibility in obtaining those data are detailed in the chart below. Please note that programs offering IELCE and Family Literacy programs have additional outcome measures they will report on. Those performance measures are also detailed below.
<table>
<thead>
<tr>
<th>Applicable For</th>
<th>Performance Measure</th>
<th>Data Collection Method</th>
<th>Local Program’s Responsibility in Obtaining Data</th>
</tr>
</thead>
<tbody>
<tr>
<td>All Adult Education Programs</td>
<td>The percentage of program participants who are in unsubsidized employment during the second quarter after exit from the program</td>
<td>Department of Labor Data Match</td>
<td>Make every possible effort to collect each participant’s social security number at intake</td>
</tr>
<tr>
<td></td>
<td>The percentage of program participants who are in unsubsidized employment during the fourth quarter after exit from the program</td>
<td>TCSG and National Student Clearinghouse Data Match Credential information from students</td>
<td>Make every effort to collect each participant’s social security number and other personally identifiable information (legal first and last name, birthday, etc.) at intake</td>
</tr>
<tr>
<td></td>
<td>The median earnings of program participants who are in unsubsidized employment during the second quarter after exit from the program</td>
<td>NRS-approved assessment pre and posttest scores</td>
<td>Administer the NRS-approved pre and posttest assessments in accordance with OAE’s assessment policy and the test manufacturer’s guidelines</td>
</tr>
<tr>
<td></td>
<td>The percentage of program participants who obtain a recognized postsecondary credential, or a secondary school diploma or its recognized equivalent during participation in or within one year after exit from the program</td>
<td>NRS-approved assessment pre and posttest scores</td>
<td>Enter assessment data into GALIS in accordance with OAE’s assessment policy</td>
</tr>
<tr>
<td></td>
<td>The percentage of program participants who, during a program year, are in an education or training program that leads to a recognized postsecondary credential or employment and who are achieving measurable skill gains (meaning an increase in their educational functioning level (EFL) for one subject) toward such a credential or employment.</td>
<td>NRS-approved assessment pre and posttest scores</td>
<td>Administer the NRS-approved pre and posttest assessments in accordance with OAE’s assessment policy and the test manufacturer’s guidelines</td>
</tr>
</tbody>
</table>

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<table>
<thead>
<tr>
<th>Effectiveness in serving employers</th>
<th>Annual employer effectiveness survey administered by OAE</th>
<th>Provide OAE with contact information for employer partners</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>IELCE Providers</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Participants gain the skills needed to pass the U.S. citizenship exam</td>
<td>Student self-reported data, which will most likely be collected through a survey</td>
<td>Obtain and enter student self-reported data into GALIS</td>
</tr>
<tr>
<td>Participant registers to vote any time during the program year</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Participant increases involvement in community activities, including:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>o Attending or organizing meetings of neighborhood, community, or political organizations</td>
<td></td>
<td></td>
</tr>
<tr>
<td>o Volunteering to work for such organizations</td>
<td></td>
<td></td>
</tr>
<tr>
<td>o Contributing to the support of such organizations</td>
<td></td>
<td></td>
</tr>
<tr>
<td>o Volunteering to work on community improvement activities</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Family Literacy Providers</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Increased involvement children’s education, including:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>o Helping children more frequently with their homework,</td>
<td></td>
<td></td>
</tr>
<tr>
<td>o Increased contact with children’s teachers to discuss children’s education, and</td>
<td></td>
<td></td>
</tr>
<tr>
<td>o Increased involvement in children’s school (attending school activities, parent meetings, and volunteering to work on school projects.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Student self-reported data, which will most likely be collected through a survey</td>
<td>Obtain and enter student self-reported data into GALIS</td>
<td></td>
</tr>
</tbody>
</table>
Increased involvement in children’s literacy-related activities, including:
- Reading to children
- Visiting a library
- Purchasing books or magazines for children
1. Performance Target Negotiations
   a. Statewide Negotiations
   Every two years, OAE negotiates statewide annual performance targets on the WIOA indicators of performance with the federal Office of Career, Technical and Adult Education (OCTAE). All WIOA core partners, including adult education, are held accountable to meeting Georgia’s partner-specific and statewide performance targets. If a state fails to meet the adjusted levels of performance, the state is subject to certain sanctions, including, after one-year, technical assistance and a performance improvement plan, and, after two years, a five percent reduction in the Governor’s Reserve Fund provided under WIOA Section 128a. (WIOA Section 116 (f)).

   b. Local Program Negotiations
   Each year, OAE negotiates performance targets with local providers. This process allows providers to negotiate reasonable, but ambitious, targets for their own program’s context. During target negotiations, OAE considers the following factors:

   o Whether the program’s targets demonstrate continuous improvement over their program’s performance in prior years; and
   o The extent to which the program’s targets help the state meet its targets as negotiated with and approved by the Office of Career, Technical, and Adult Education (OCATE).

   Once approved, OAE holds programs accountable to meeting their negotiated targets. OAE will provide more details about the annual target negotiations process at the beginning of each fiscal year.

B. Monitoring

1. Desktop Monitoring
   a. Grant Program Support Coordinators
   OAE assigns each program a Grant Program Support Coordinator (GPSC) who serves as their main system office contact. GPSCs provide technical assistance and support to programs; with a focus on ensuring programs provide high quality, standards-based, and evidence-based instruction to students. GPSCs also provide support in other areas as needed, including recruiting and retaining students, building meaningful partnerships, and strategically using grant funds to meet program outcomes. GPSCs also conduct frequent, informal monitoring focused on instruction.

   b. Quarterly Fiscal Monitoring
   Each quarter, OAE selects a few programs for quarterly fiscal desktop monitoring through the Workiva financial management system. The quarterly desktop monitoring process looks at a program’s budget, expenditures, and supporting documentation for a relatively short time period.
(between one and three months) and serves as an additional internal control to ensure adult education federal and state funds are being used in accordance with Federal statutes, regulations, and the terms and conditions of the Federal award.

The quarterly monitoring procedures are as follows:

1) OAE will notify the program administrator via email that they have been selected for monthly monitoring. The email notification will contain information regarding the specific month(s) OAE will be monitoring, as well as which grant program(s) (IELCE and/or 231/225/state).

2) Upon notification, the program will upload supporting documentation for any expenditures into the Workiva.

3) OAE will review the program’s records for the following items:
   - The program has provided sufficient backup documentation for each listed expense;
   - Each listed expense is allowable, allocable, reasonable, and necessary per the Uniform Guidance, AEFLA, and the terms and conditions of the grant award;
   - Each expense is correctly charged to the right line item and cost objective;
   - The program has not exceeded the 5% administrative cost limit as required in WIOA Section 233, or, if they have exceeded the 5% administrative cost limit, they have an approved waiver from OAE.
   - The expenses reported in the monthly financial tracker match OAE’s records, including the monthly expenses, budgeted amounts, expended amounts, and balances.
   - The program’s time and effort certifications comply with OAE’s time and effort policy and the Uniform Grant Guidance.

Please note, during this process OAE may request additional clarification or backup documentation.

Following the desktop monitoring, OAE will inform the program if there are any issues that need to be resolved, as well as the action steps required to resolve those issues, such as: further monitoring, additional documentation, or paying back unallowable expenditures.

For more information about quarterly desktop monitoring, please view OAE’s Monthly & Quarterly Financial Procedures.

c. Spending, Performance, and Professional Development
Throughout the program year, OAE will closely monitor program spending, progress towards negotiated targets, and completion of required professional development hours. A program can
expect multiple check-in points throughout the program year and technical assistance towards an area of concern.

2. Onsite Monitoring
OAE, as a pass-through entity of federal funds is required to monitor its programs (2.CFR § 200.31). The monitoring process has three main goals:

- Ensure each local program complies with all relevant state and federal regulations as well as the terms of the grant award;
- Surface areas for program improvement and provide appropriate technical assistance; and
- Surface and understand areas where local programs are excelling.

OAE conducts virtual and onsite monitoring visits to selected programs annually. Programs can receive a monitoring visit in the following three areas:

- Data, Intake & Assessment
- Instruction, Programming & Performance
- Fiscal

OAE selects programs to monitor based on the results of an annual fiscal and programmatic risk assessment, whether the program has received a monitoring visit within the past three years, and if OAE has another documented concern. OAE notifies programs if they have been selected for a monitoring visit each fall, and the visits typically occur from late fall through early spring, although this timeframe is subject to change.

Following the monitoring visit, the program receives a Monitoring Review Form that outlines commendations, findings, areas for improvement, as well as next steps.

For more information about the monitoring process, including a sample schedule and the monitoring protocol, please view the Local Program Monitoring Guide.

C. Compliance
If OAE determines a program is out of compliance with any federal or state statutes, regulations, or the terms and conditions of the grant award, it will take appropriate action to remedy the area(s) of noncompliance.

1. Special Conditions
Per 2 CFR § 200.208, OAE may impose special conditions in the following instances:

- Based on the results of a risk assessment,
- When a program is failing to comply with the terms or conditions of the award,
- When a program does not meet its negotiated performance targets; and
- If the program is not otherwise responsible.
Examples of special conditions include but are not limited to: (a) requiring additional fiscal or programmatic reporting, (b) requiring prior approval for certain activities, (c) requiring the program to obtain additional technical assistance, or (d) placing the program on a Corrective Action Plan (CAP). Please note, the CAP process is outlined in the following section.

If OAE imposes special conditions on a program, it will notify the program and agency head via letter. The letter will outline the special condition(s), why OAE is imposing the condition(s), and the steps the program needs to take to remove the additional requirements.

2. Corrective Action Plan
A Corrective Action Plan (CAP) – developed collaboratively by the program and OAE – outlines areas of noncompliance, steps to address each area, and a timeline for completing those steps. The CAP process is as follows:

   a. OAE will notify the program administrator and agency head via letter, that it is placing the program on corrective action plan.
   
   b. Programs must respond to the letter by submitting a completed CAP template within two weeks from the date of the letter unless the letter specifies another timeframe due to the severity or complexity of the issue.
   
   c. Within two weeks, OAE notifies the program by email whether the CAP is accepted or needs additional editing. Once OAE accepts the CAP, it will notify the program via email.
   
   d. The program works through the actions outlined in the CAP by the designated deadlines. If a program needs to request a modification or deadline extension for any of the items in the CAP, it must submit a revised CAP to OAE. OAE will notify the program via email whether the modifications or extensions have been approved within two weeks of receipt of the revised CAP.
   
   e. Upon completion of the CAP, OAE will send a letter notifying the program administrator and agency head that all actions in the CAP have been successfully addressed and that the program is no longer on corrective action.

3. Strategic Improvement Plan
Programs that do not meet their negotiated targets by the end of the program year may be placed on a Strategic Improvement Plan (SIP) that addresses the area(s) where the program is underperforming.

4. Other Remedies for Noncompliance
Per 2 CFR § 200.339, if OAE determines a program cannot remedy its noncompliance through special conditions, it may take additional actions, including, but not limited to:

   a. Temporarily withholding reimbursement until the area of noncompliance is sufficiently addressed;
b. Disallowing the use of funds for all or part of the cost of the activity or action not in compliance.
c. Wholly or partly suspending or terminating the Federal award per 2 CFR § 200.339.

5. Hearing & Appeals Process

Per 2 CFR § 200.342, the subrecipient has the opportunity to object and request a hearing to appeal the Technical College System of Georgia’s (TCSG) decision related to remedies for noncompliance or termination in accordance with the below policies and procedures. Note that if a subrecipient’s grant is terminated, it will not receive reimbursement for any grant activities that occurred during the termination proceedings, unless the action is rescinded or the subrecipient’s appeal is successful.

a. To appeal this decision, the subrecipient must send a written request for a hearing to the Commissioner of the Technical College System of Georgia within 30 calendar days from the date of the termination letter. The request for a hearing must include the nature of the request for a hearing, including any reasons for disagreements with TCSG’s decision. This written notice should be sent via certified mail to:

   Technical College System of Georgia
   Attention: Commissioner of the Technical College System of Georgia
   1800 Century Place N.E., Suite 300
   Atlanta, GA 30345-4304

   The subrecipient should also copy the General Counsel in the Office of the Commissioner on the written request.

b. TCSG will hold a hearing within 15 calendar days after it receives the request. The subrecipient will receive written notice at least five days prior to the hearing regarding the date and location of the hearing.

c. During the hearing, the subrecipient will have the opportunity to present evidence - including written statements, documentation, and witnesses – that TCSG’s decision was contrary to federal or state statutes, federal or state regulations, or applicable policies and procedures related to the requirements of the Workforce Innovation & Opportunity Act and the Adult Education and Family Literacy Act. TCSG will also have an opportunity to present evidence – including written statements, documentation, and witnesses – as to why it made the decision regarding remedies for noncompliance or termination.
d. If the subrecipient or its authorized representative does not appear at the designated time, location, and date of the hearing, the appeal will be considered closed and the hearing process will be terminated.

e. If TCSG determines that its proposed action regarding termination or remedies for noncompliance is contrary to federal or state statutes, federal or state regulations, or applicable policies and procedures related to the requirements of the Workforce Innovation & Opportunity Act and the American Education and Family Literacy Act, TCSG will rescind its proposed action, and if applicable, determine an alternative action.

f. The Commissioner will issue a written decision within ten days of the date of the conclusion of the hearing. The written decision shall include the findings from the hearings and the reasons for the decision.

g. If TCSG does not rescind its action as a result of the hearing, the subrecipient can then file an appeal with the Secretary of Education within 20 calendar days after the subrecipient has been notified of the hearing results. If supported by substantial evidence, findings of fact of the Technical College System of Georgia are final.

h. TCSG shall keep a record of the proceedings. Any party, at its expense, may obtain a copy of the record of the proceedings.
VI. ADULT EDUCATION AND WORKFORCE DEVELOPMENT

Key Takeaways
- AEFLA-funded adult education providers are a critical component of Georgia’s workforce development system.
- Adult education providers should develop strong and strategic partnerships with the Local Workforce Development Board(s) (LWDB) and One-Stop Delivery System(s) in the Local Workforce Development Area(s) (LWDA) they serve students.
- Adult education providers should ensure they provide services that meet their local needs, as outlined by each region’s local plan.
- At least one adult education program in each Local Workforce Development Area (LWDA) is responsible for providing representation on the LWDB, negotiating the One-Stop MOU, and paying one-stop infrastructure costs.

Under WIOA, the workforce development system connects jobseekers, particularly those with barriers to employment, to jobs in in-demand industries that earn a family sustaining wage. To accomplish this goal, WIOA unites four core partners:

- Adult, Dislocated Worker, and Youth, administered by the United States Department of Labor (DOL) under Title I;
- Adult Education and Family Literacy Act (AEFLA), administered by the United States Department of Education (USED) under Title II;
- Wagner-Peyser Act employment services, administered by DOL under Title III; and
- Vocational Rehabilitation Act, administered by USED under Title IV.

As a core WIOA partner, Title II-funded adult education providers play a key role in Georgia’s workforce development system. Much of this key role involves developing strong and strategic partnerships with Local Workforce Development Board(s) and the One-Stop Delivery System(s) in the Local Workforce Development Area(s) where an adult education program serves students.

A. Local Workforce Development Areas
Per WIOA Section 106, Georgia is divided into 19 Local Workforce Development Areas (LWDAs). Each LWDA has its own Local Workforce Development Board (LWDB) that is responsible for overseeing the workforce development system in the counties it serves. Please note that many adult education providers may serve students in more than one LWDA. Adult education providers must ensure they work with the LWDBs and One-Stop Delivery Systems for all LWDAs where they serve students.
B. Local Workforce Development Boards

Established under WIOA Title I, Local Workforce Development Boards (LWDBs) oversee the workforce development system in their Local Workforce Development Area (LWDA) and connect jobseekers with the resources and skills they need to obtain jobs in in-demand industries. LWDBs are comprised of business and community members, as well as at least one representative from an adult education provider located within the board’s LWDA.

Per 20 CFR § 679.370, LWDBs have several key functions, including, but not limited to:

- Developing and submitting a four-year local and regional plan;
- Researching and analyzing the workforce system and regional labor market in their area;
- Meeting the needs of both industry and jobseekers in their region by: (a) engaging with employers and businesses, (b) establishing and implementing career pathways, and (c) utilizing technology to ensure the workforce system is easily accessible to all jobseekers;
- Selecting and overseeing providers of youth workforce investment activities, workforce investment activities, training services, and one-stop operations; and
- Coordinating with other core partners, such as reviewing grant applications for adult education providers.

C. The One-Stop Delivery System

Per WIOA Section 121 and 34 CFR § 463.300, a one-stop delivery system allows individuals to seamlessly access multiple workforce development services, such as adult and postsecondary education, training, and workplace preparation activities, that improve long-term employment outcomes. One-stop delivery systems must include at least one comprehensive physical center, (comprehensive one-stop center) in each LWDA. These comprehensive one-stop centers provide access to required one-stop partners, including adult education programs funded under WIOA Title II (34 CFR § 463.305). In addition, LWDAs can have affiliate one stop centers that provide more limited services (34 CFR § 463.310).

Each LWDA’s One-Stop Delivery System is governed by a Memorandum of Understanding (MOU). Per 34 CFR § 463.500, the MOU is the product of local discussion and negotiation, and is an agreement developed and executed between the LWDB and the one-stop partners, with the agreement of the chief elected official and the one-stop partners, relating to the operation of the one-stop delivery system in the local area. 34 CFR § 463.500, as well as OAE Memo 20.4.20 outlines the required elements of a One Stop MOU.
D. Responsibilities of the Adult Education Program

1. Aligning Services with Local Needs
Per WIOA Section 108, each LWDA is responsible for developing a local plan that outlines their strategies for the workforce development system. The local plan should include elements such as:

   a. The region’s in-demand industries,
   b. An analysis of the region’s workforce, including labor force and unemployment data,
   c. An analysis of the workforce development activities, and
   d. A description of the local board’s strategic vision and goals for preparing an educated and skilled workforce.

Adult education providers must ensure that the services they offer meet the needs and goals as outlined in their local plan(s) of the LWDA(s) in which they serve students. Local plans are available on WorkSource Georgia’s website.

2. State Delegation of Responsibilities to Local Programs
Per 34 CFR § 463.400 and 34 CFR § 463.415, the state agency that administers the Adult Education and Family Literacy Act (AEFLA) program is the required one-stop partner. However, per 34 CFR § 463.415, Georgia has delegated its one-stop partner responsibilities – such as negotiating one-stop MOUs, paying infrastructure and other shared costs, and providing representation on LWDBs – to local programs.

The chart on at the end of this section outlines the one-stop partner responsibilities as detailed in 34 CFR § 463.420, as well as which programs in a given LWDA are responsible for fulfilling those roles and responsibilities.

3. Representation on the Local Workforce Development Board
Per 20 CFR § 679.320, Local Workforce Development Boards must include “at least one eligible training provider administering adult education and literacy activities under WIOA Title II.” This regulation means that each LWDB should have at least one adult education representative. Adult education programs within the LWDA should collaborate to meet required responsibilities on the Local Workforce Development Board.

4. Direct Linkage
All adult education providers must ensure that its services have a “direct linkage” to the one-stop centers in its assigned area. A “direct linkage” means that an interested student who learns of adult education through a one-stop center will be contacted directly (by phone call, web-based communication, etc.), within a reasonable time frame, by a program staff member who can provide information about its services. Please note that exclusively providing a phone number, website, information, a pamphlet, or materials does not constitute a “direct linkage.”
In addition, all adult education providers should make every effort to attend the one-stop partner meetings for the one-stop(s) in their region.

5. One-Stop MOUs and Infrastructure Costs
Select adult education programs are also responsible for participating in One-Stop MOU negotiations, signing the MOU, and using a portion of their federal grant funds to pay their proportionate share of one-stop infrastructure costs (34 CFR § 463.720). Typically, only one adult education provider in each LWDA signs the MOU and pays infrastructure costs. In most cases, the adult education provider that provides LWDB representation also pays infrastructure costs. Appendix B of OAE Memo 20.4.20 outlines the most recent structure for One-Stop MOU negotiations and infrastructure costs.³

Before signing One-Stop MOUs, programs must ensure:
- That the MOU contains the elements outlined in 34 CFR § 463.500;
- Per 34 CFR § 463.715, the infrastructure costs are calculated based on a reasonable cost allocation methodology whereby infrastructure costs are charged to each partner in proportion to its use of the one-stop center, relative to the benefits received. For example, a MOU might use a square-footage allocation methodology where partners pay their share of infrastructure costs based on the square footage they use.
- The MOU may also include a calculation for “other shared costs,” such as career services. Similar to infrastructure costs, these costs must be allocated in proportion to the benefit each partner received. For example, the MOU may allocate “other shared costs” based on how much a partner utilizes a particular service.

Programs should pay one-stop infrastructure costs out of the federal 231 administrative budget (34 CFR § 463.720). Per 34 CFR § 463.26, one-stop infrastructure costs are considered administrative and subject to the 5% administrative cost limit.

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³ One-Stop MOUs were most recently negotiated in spring 2020. The MOUs are typically renegotiated every three years unless substantial changes are required.
<table>
<thead>
<tr>
<th>Citation</th>
<th>Role/Responsibility</th>
<th>Programs Responsible Within a Given LWDA</th>
</tr>
</thead>
<tbody>
<tr>
<td>34 CFR § 463.420</td>
<td>Provide access to its programs or activities through the one-stop delivery system, in addition to any other appropriate locations.</td>
<td>All adult education providers in the LWDA</td>
</tr>
<tr>
<td></td>
<td>Use a portion of funds made available to the partner's program, to the extent consistent with the Federal law authorizing the partner's program and with Federal cost principles in 2 CFR parts 200 and 3474 (requiring, among other things, that costs are allowable, reasonable, necessary, and allocable), to: 1. Provide applicable career services; and 2. Work collaboratively with the State and Local WDBs to establish and maintain the one-stop delivery system. This includes jointly funding the one-stop infrastructure through partner contributions that are based upon: a. A reasonable cost allocation methodology by which infrastructure costs are charged to each partner based on proportionate use and relative benefit received; b. Federal cost principles; and c. Any local administrative cost requirements in the Federal law authorizing the partner's program. (This is further described in § 463.700.)</td>
<td>The adult education provider(s) in the LWDA designated to pay one-stop infrastructure costs.</td>
</tr>
<tr>
<td>34 CFR § 463.420</td>
<td>Enter into an MOU with the Local WDB relating to the operation of the one-stop delivery system that meets the requirements of § 463.500(b).</td>
<td>The adult education program administrator or other representative from the adult education program designated to sit on the board in that LWDA.</td>
</tr>
<tr>
<td>34 CFR § 463.420</td>
<td>Provide representation on the State and Local WDBs as required and participate in Board committees as needed.</td>
<td>The adult education program administrator or other representative from the adult education program designated to sit on the board in that LWDA.</td>
</tr>
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</table>
# Appendix A: Abbreviations & Definitions

<table>
<thead>
<tr>
<th>Abbreviation</th>
<th>Word</th>
<th>Definition &amp; Notes</th>
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<tbody>
<tr>
<td>ABE</td>
<td>Adult Basic Education</td>
<td>ABE is adult education at or below the eighth-grade level.</td>
</tr>
<tr>
<td>AEFLA</td>
<td>Adult Education &amp; Family</td>
<td>AEFLA refers to Title II of WIOA which provides funding and outlines the</td>
</tr>
<tr>
<td></td>
<td>Literacy Act</td>
<td>requirements for adult education &amp; literacy programs.</td>
</tr>
<tr>
<td>ASE</td>
<td>Adult Secondary Education</td>
<td>ASE is adult education at the ninth through twelfth grade levels.</td>
</tr>
<tr>
<td>CPH</td>
<td>Career Plus HSE</td>
<td>CPH allows Georgians ages 21 and older to earn a HSE while preparing for a career</td>
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<tr>
<td></td>
<td></td>
<td>in a high-demand area.</td>
</tr>
<tr>
<td>CCRS</td>
<td><a href="https://www.ed.gov/about/offices/list/dae/about.html">College &amp; Career Readiness Standards</a></td>
<td>Adult education instructional standards</td>
</tr>
<tr>
<td>CFR</td>
<td>Code of Federal Regulations</td>
<td>The CFR is the publication where federal agencies and departments list their rules</td>
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<tr>
<td></td>
<td></td>
<td>and regulations. CFR Title 2 (the Uniform Guidance) and CFR Title 34 (EDGAR)</td>
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<tr>
<td></td>
<td></td>
<td>apply to programs receiving AEFLA funds.</td>
</tr>
<tr>
<td>CLCP</td>
<td><a href="https://www.gachieve.org/success%E5%87%B1/programs/CLCP">Certified Literate Community Program</a></td>
<td>CLCP is Georgia's network of county-based nonprofit organizations with the mission</td>
</tr>
<tr>
<td></td>
<td></td>
<td>of combatting low literacy levels in their respective counties.</td>
</tr>
<tr>
<td>DOL</td>
<td>Department of Labor</td>
<td>The federal agency responsible for administering WIOA Title I and Title III funds</td>
</tr>
<tr>
<td>EFL</td>
<td>Educational Functioning Level</td>
<td>An EFL is an adult learner's grade-level equivalent based on what the learner can</td>
</tr>
<tr>
<td></td>
<td></td>
<td>do. Levels include ABE 1 through 6 and ESL 1 through 6.</td>
</tr>
<tr>
<td>ELA</td>
<td>English Language Acquisition</td>
<td>An English Language Acquisition Program prepares English language learners with</td>
</tr>
<tr>
<td></td>
<td></td>
<td>the skills needed to transition into postsecondary education and employment.</td>
</tr>
<tr>
<td>ELPS</td>
<td><a href="https://www.gachieve.org/success%E5%87%B1/programs/ELPS">English Language Proficiency Standards</a></td>
<td>Adult education instructional standards for English language learners</td>
</tr>
<tr>
<td><strong>GALIS</strong></td>
<td>Georgia Adult Learners Information System</td>
<td>GALIS is Georgia's NRS-compliant data system which tracks information related to adult education</td>
</tr>
<tr>
<td><strong>GEPA</strong></td>
<td>General Education Provisions Act</td>
<td>Contains a broad array of statutory provisions that are applicable to the majority of federal education programs administered by USED</td>
</tr>
<tr>
<td><strong>GPSC</strong></td>
<td>Grant Program Support Coordinator</td>
<td>OAE assigns each program a GPSC who serves as their main system office contact.</td>
</tr>
<tr>
<td><strong>HSE</strong></td>
<td>High School Equivalency</td>
<td>An alternative to a high school diploma</td>
</tr>
<tr>
<td><strong>IELCE</strong></td>
<td>Integrated English Literacy &amp; Civics Education</td>
<td>Adult education that incorporates both English language and citizenship instruction, funded under section 243 of WIOA</td>
</tr>
<tr>
<td><strong>IET</strong></td>
<td>Integrated Education &amp; Training</td>
<td>An education and training program that concurrently offers context-specific adult education and occupation-specific training</td>
</tr>
<tr>
<td><strong>LINCS</strong></td>
<td>Literacy Information &amp; Communication System</td>
<td>OCTAE’s national leadership initiative to expand evidence-based practice in the field of adult education</td>
</tr>
<tr>
<td><strong>LWDA</strong></td>
<td>Local Workforce Development Area</td>
<td>Any one of the 19 LWDA’s in Georgia</td>
</tr>
<tr>
<td><strong>LWDB</strong></td>
<td>Local Workforce Development Board</td>
<td>A regional board that connects job seekers with resources and training to obtain jobs in in-demand industries</td>
</tr>
<tr>
<td><strong>MOU</strong></td>
<td>Memorandum of Understanding</td>
<td>An agreement between two or more parties outlined in a formal document</td>
</tr>
<tr>
<td><strong>MSG</strong></td>
<td>Measurable Skill Gain</td>
<td>A performance indicator that demonstrates a student has advanced an EFL level or obtained a HSE</td>
</tr>
<tr>
<td><strong>NRS</strong></td>
<td>National Reporting System</td>
<td>The national accountability system for adult education</td>
</tr>
<tr>
<td><strong>OAE</strong></td>
<td>Office of Adult Education</td>
<td>The TCSG office responsible for administering AEFLA funds and overseeing AEFLA-funded programs</td>
</tr>
<tr>
<td><strong>OCTAE</strong></td>
<td>Office of Career, Technical, &amp; Adult Education</td>
<td>The federal agency responsible for administering AEFLA funds to states</td>
</tr>
<tr>
<td>One-Stop</td>
<td>One-Stop</td>
<td>A brick-and-mortar center, also known as an American Job Center, that connects jobseekers with services, training, and resources, including adult education. LWDBs oversee the one-stops in their regions.</td>
</tr>
<tr>
<td>------------</td>
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<td>--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>SDA</td>
<td>Service Delivery Area</td>
<td>The geographic area in which a program will serve students</td>
</tr>
<tr>
<td>TABE</td>
<td>Tests of Adult Basic Education</td>
<td>TABE is a set of diagnostic tests that adult education programs use to determine a person's skill levels and aptitudes in reading, math, and English.</td>
</tr>
<tr>
<td>TCSG</td>
<td>Technical College System of Georgia</td>
<td>TCSG’s Office of Adult Education is responsible for subgranting AEFLA funds out to eligible providers</td>
</tr>
<tr>
<td>USED</td>
<td>The United States Department of Education</td>
<td>The federal agency responsible for administering Title II (AEFLA) and Title IV WIOA funds</td>
</tr>
<tr>
<td>WIOA</td>
<td>Workforce Innovation &amp; Opportunity Act</td>
<td>The federal law that unites core partners in preparing individuals for jobs in in-demand industries.</td>
</tr>
</tbody>
</table>
APPENDIX B: GRANT AWARD NOTIFICATION

TERMS, CONDITIONS & ASSURANCES

I. FISCAL & GRANT MANAGEMENT REQUIREMENTS

1. The subrecipient will use its grant funds to fulfill the purposes and meet the requirements of the Workforce Innovation and Opportunity Act (WIOA), including Title II, the Adult Education and Family Literacy Act (AEFLA), and any other statutes pertaining to a federally-funded workforce education program, including but not limited to:
   a) Aligning its activities to its Local Workforce Development Board’s (LWDB) local and regional plans;
   b) Collaborating with its LWDB to provide supportive services and promote concurrent enrollment with Title I programs; and
   c) Providing adult education and literacy activities only to eligible individuals as outlined in WIOA Section 203 (4).

2. The subrecipient will comply with the regulations listed in 2 CFR Part 200, the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards.

3. The subrecipient will comply with the General Education Provisions Act (GEPA) and implement measures to remove barriers to access and participation in the program’s services. The subrecipient will give specific consideration to persons who may experience a barrier based upon factors such as gender, race, national origin, color, disability, or age.

4. The subrecipient agrees to comply with 2 CFR § 200.216, which prohibits procuring or obtaining, extending or renewing a contract to procure or obtain, or entering into a contract to procure or obtain telecommunications equipment produced by Huawei Technologies Company or ZTE Corporation (or any subsidiary or affiliate of such entities).

5. The subrecipient agrees to disclose in writing, within 72 hours, any potential conflict of interest to the Federal awarding agency of pass-through entity per 2 CFR §200.112.

6. The subrecipient agrees to disclose in writing, within 72 hours, to the Federal awarding agency or pass-through entity all violations of Federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the Federal award per 2 CFR §200.113.

7. The United States Department of Education has adopted the requirements outlined in 2 CFR §200.175. Under this condition, your subaward may be terminated if you or an employee:
a) Engage in severe forms of trafficking in persons during the period of time that the award is in effect;
b) Procure a commercial sex act during the period of time that the award is in effect; or
c) Use forced labor in the performance of the award or subawards under the award.

8. The subrecipient agrees that it will comply with sections 8301 through 8303 of the Buy American Act. (41 U.S.C. 8301-8303)

9. The subrecipient agrees that it will provide the Technical College System of Georgia and auditors access to its financial statements and all other records pertaining to this contract as needed for the Technical College System of Georgia to meet its requirements under WIOA, the Uniform Grant Guidance, and any other applicable state or federal laws, policies or regulations. (2 CFR § 200.332)

10. The subrecipient agrees to comply with all federal and state grant closeout requirements included but not limited to:
   a) The subrecipient will submit all financial, performance, and other requested reports no later than 90 days after the end date of this contract’s period of performance. (2 CFR §200.344).
   b) The subrecipient will liquidate all obligations incurred under this award within 90 days after the end date of this contract’s period of performance. All funds not obligated by this date must be returned to the Technical College System of Georgia. (2 CFR §200.344).
   c) The subrecipient must account for any real and personal property acquired with Federal funds or received from the Federal Government in accordance with §200.310 (Insurance coverage) through §200.316 (Property trust relationship) and §200.330 (Reporting on real property).

11. Per 2 CFR § 200.333 and 34 CFR 81.31(c), subrecipients must retain all grant-related documentation, including financial records and supporting documentation, student records, and other programmatic records, for a period of five years from the date of the final annual fiscal report, with the following exceptions:
   a) If any litigation, claim, or audit is started before the end of the record retention period, then the subrecipient must retain the records until any litigation, claims, or audit findings have been resolved and the final action has been taken.
   b) A program must retain records for real property or equipment acquired with grant funds for a period of five years after the final disposition. Per 2 CFR § 200.335, programs may maintain electronic records provided that they remain readable and cannot be altered.
12. Per 2 CFR § 200.332 and 34 CFR § 76.563, the Technical College System of Georgia (TCSG), as a pass-through entity of federal funds, must provide subrecipients the opportunity to use a restricted indirect cost rate for their Title II American Education and Family Literacy Act (AEFLA) funds. If the subrecipient does not already have a restricted indirect cost rate negotiated with its cognizant federal agency or another pass-through entity, it must negotiate a restricted indirect cost rate with the pass-through entity listed in this award notification.

13. The funds provided in this award must be used to supplement, not supplant, local funds. (29 U.S. Code §3331, WIOA Section 241)

14. All items purchased with AEFLA federal or state matching dollars must be allowable, allocable, reasonable, and necessary. OAE reserves the right to disallow or require repayment of costs that do not meet these criteria. (2 CFR § 200.403-405, 2 CFR § 200.339).

15. The subrecipient must use no more than 5% of its Adult Education & Family Literacy Act funds for administrative costs as outlined in WIOA Section 233. Administrative costs include: planning, administration (including carrying out the requirements of section 116), professional development, and the activities described in paragraphs (3) and (5) of WIOA section 232. Please note that subrecipients are required to offer professional development. If a subrecipient requires a higher administrative cost percentage, it must request a waiver from TCSG.

16. The subrecipient agrees to meet the single audit requirements set forth in 2 CFR §200.501, which require that a non-federal entity that expends $750,000 or more during the fiscal year will have single audit conducted.

17. Subrecipients are responsible for following the financial management regulations and maintaining internal controls over their federal award. (2 CFR 200.302 and 200.303).

18. Per state requirement, the subrecipient agrees that funding provided by the Technical College System of Georgia pursuant to this contract is provided on a 30-day reimbursement basis via ACH (electronic funds transfer) payment only. The subrecipient agrees that it will only request funds for reimbursement for items that have been liquidated, are within the subrecipient’s approved budget or subsequent approved budget amendments, and are an allowable, allocable, reasonable, and necessary use of state and federal funds. The reimbursement request (either the cash draw for TCSG entities or a funds requisition request for non-TCSG entities) is due on or before the 15th of the month for the prior month’s expenses.
19. Per state requirement, the subrecipient agrees that it will follow TCSG’s fiscal management procedures, including, but not limited to the procedures for monthly financial tracking in Workiva and budget and project amendments.

20. Costs associated with High School Equivalency (HSE) (HiSET, GED, Career PLUS HSE, etc.) tests, test administration, proctoring, travel, or any other activity relating to the actual HSE test process are not allowable and cannot be reimbursed with federal or state grant funds. The only allowable costs are those associated with test preparation (e.g., instruction, materials for instruction).

21. Alcoholic beverages, entertainment costs, and costs for HSE commencement ceremonies are not an allowable use of federal or state dollars. (2 CFR §200.423, 2 CFR §200.438, 2 CFR §200.429)

22. The subrecipient agrees that it will follow its organization’s local travel policy and that its policy complies with the regulations listed in 2 CFR § 200.475. Subrecipients may choose to adopt the State of Georgia travel policy. If a subrecipient adopts the State of Georgia travel policy, it must be noted in its agency travel policy.

23. The subrecipient agrees it will follow its organization’s local procurement procedures and that those procedures meet the requirements outlined in 2 CFR § 200.318 - §200.326. Per 2 CFR § 200.317, state agencies must utilize the same policies and procedures they use for procurements from non-federal funds.

24. Per state requirement, under this subaward, the subrecipient may not subcontract any direct program or instructional services to a third party.

25. The subrecipient must maintain inventory records for all equipment that is over $5,000 in value or “pilferable” supplies such as computing devices in alignment with 2 CFR § 200.313. These records must include the information noted in 2 CFR § 200.313(d)(1). Per state requirement, the subrecipient must maintain inventory records in Workiva as well as any applicable local inventory management system.

26. The subrecipient agrees to maintain Time and Effort Certification Forms for all employees paid in full or in part with federal or state matching adult education grant funds. The Time and Effort Certification Forms must comply with 2 CFR § 200.430 and TCSG’s Time and Effort Policies and Procedures.
27. Per 2 CFR § 200.208 & § 200.339 – 343, if the Technical College System determines that a subrecipient is out of compliance with any federal or state statutes, regulations, or the terms and conditions of the grant award, it may impose additional conditions to remedy the area(s) of noncompliance. If OAE determines that noncompliance cannot be remedied by imposing additional conditions, it may take one or more of the following actions, as appropriate for the circumstances:
   a) Temporarily withhold cash payments until the subrecipient corrects the area of noncompliance;
   b) Disallow the use of funds for all or part of the cost of the activity or action not in compliance;
   c) Wholly or partly suspend or terminate the Federal award;
   d) Withhold further awards for the project or program;
   e) Take other remedies that may be legally available.

28. If OAE takes any of the actions noted in the above assurance to remedy noncompliance, the subrecipient has the opportunity to appeal the decision. (2 CFR § 200.342)

29. Any cancellation, termination, or suspension of this contract, if imposed, shall become effective at the close of business on the day of subrecipient’s receipt of written notice from the Technical College System of Georgia.

30. Subrecipients are prohibited from text messaging while driving a government owned vehicle or while driving their own privately-owned vehicle during official grant business. (Executive Order 13513)

II. PROGRAM REQUIREMENTS

1. Subrecipients agree to comply with all Technical College System of Georgia State Board policies pertaining to adult education and High School Equivalency tests or diplomas per state requirement.

2. Per state requirement, the subrecipient will have an Emergency Operations and Safety Plan for all locations where classes are held and employees are located.

3. The subrecipient will abide by the Technical College System of Georgia’s non-discrimination policy and any applicable federal statutes against discrimination for the provision of services or in its hiring policies on the basis of race, color, creed, national or ethnic origin, sex, religion, disability, age, political affiliation or belief, genetic information, disabled veteran, veteran of the Vietnam Era, spouse of military member or citizenship status (except in those special circumstances permitted or mandated by law).
4. The subrecipient agrees to follow all relevant safety and health policies and procedures as listed by the Georgia Department of Health, Occupational Safety and Health Administration, and the Centers for Disease Control.

5. The subrecipient should establish a literacy advisory committee (LAC) for its service delivery area (SDA) with the goal of delivering the most effective and efficient adult literacy programs. The LAC should meet, at a minimum, four times per year, and include local civic leaders and representatives of adult literacy providers, business, and industry. The subrecipient may choose to use its Local Workforce Development Board or college board to fulfill this requirement. (O.C.G.A § 20-4-11(7))

6. The subrecipient agrees that it will: (a) negotiate MSG and enrollment targets with OAE, or (b) request that OAE set its MSG and enrollment targets. The subrecipient understands that programs that do not meet their negotiated targets may be subject to additional conditions including, but not limited to increased technical assistance, adjustments to their funding allocations, or financial sanctions.

7. The subrecipient agrees to turn in all programmatic and fiscal reports required by OAE, including but not limited to the Career Services Quarterly report, a midyear budget and performance analysis, and a grant renewal application, to the Office of Adult Education (OAE). (2 CFR § 200.329)

8. Per state requirement, the subrecipient agrees to comply with the following staffing requirements as listed in the Competitive Request for Applications and the TCSG Office of Adult Education Policies and Procedures Manual:
   a) The subrecipient will appoint a full time (30 or more hours per week) program administrator. To receive an exemption from this requirement, a subrecipient must request a waiver from the Office of Adult Education. The program administration must have a degree from a four-year college or university.
   b) The subrecipient will employ at least one part-time Career Service Specialist. A Community Based Organization (CBO) can either employ a Career Service Specialist or partner with another organization that can provide transition and support services. The Career Service Specialist should have a minimum of a two-year degree.
   c) Instructors must have a degree from a four-year college or university.
   d) The subrecipient will ensure that someone on staff serves as an instructional lead focused on ensuring instructors are implementing high-quality, evidence-based, standards-based instructional strategies that lead to positive student outcomes. The instructional lead must have a degree from a four-year college or university.
e) The subrecipient will ensure someone on staff serves as a data coordinator. The data coordinator must have a high school diploma or its recognized equivalency.

9. Per state requirement, the subrecipient must pay part time instructors a minimum of $20 per hour, unless it requests and receives a waiver from the Office of Adult Education.

10. Per state requirement, the subrecipient will ensure that full time instructors spend 70% of their time engaged in synchronous and/or asynchronous instructional planning and delivery.

11. Per state requirement, the subrecipient will provide local professional development for staff and faculty and ensure participation in state-provided professional development and meetings as the Technical College System of Georgia deems appropriate or mandatory. The subrecipient agrees to comply with the established professional development (PD) minimum hour requirements for all program personnel as outlined in the Office of Adult Education Policy and Procedures manual, which includes: (a) at least 24 professional development hours for the program administrator, and full-time (FT) instructors, faculty, and staff, and (b) a minimum of 12 hours for part time (PT) instructors, faculty, and staff. More specifically, the following PD requirements must be met as part of the minimum hour requirement:
   a) **Program Administrators** must attend the annual Operations meeting and the four Program Administrator meetings.
   b) **Lead instructors** are required to complete a minimum of 12 hours (FT)/ 6 hours (PT) of targeted instructional leader training offered by the OAE.
   c) **Career Services Specialists** are required to complete a minimum of 12 hours (FT)/ 6 hours (PT) of targeted transition focused training offered by the OAE.
   d) **Data Managers** (FT and PT) are required to complete a minimum of 6 hours of targeted data focused training offered by the OAE.
   e) **Instructors** are required to attend a minimum of 12 hours of OAE sponsored training if full time and 6 hours if part time.

The state expects that, at a minimum, 80% of staff will meet these minimum PD requirements during each fiscal year. Staff should participate in PD opportunities, whether local or state-provided, at minimum, each quarter. Local PD opportunities must be entered into GALIS within 30 days of the PD opportunity.

12. Per state requirement, the subrecipient will not charge adults enrolled or wishing to enroll in adult education programs (including programs for adults with limited English proficiency), tuition, fees, or any other charges, or require adults to purchase books or any other materials needed to participate in the program. Please note that this provision does not apply to Integrated Education and Training (IET) courses. If the program receives program income by charging reasonable and necessary tuition or fees for IET courses, it must use that income to
provide additional adult education and literacy services that it would otherwise be unable to
provide. Program income from tuition and fees must be: (a) accounted for in program
records, and (b) used only for costs allowable under AEFLA. (2 CFR § 200.307)

13. Per state requirement, the subrecipient agrees that it will not close classes for more than two
consecutive weeks without written approval from the Technical College System of Georgia’s
Office of Adult Education. Any request to close classes for more than two consecutive weeks
must be requested at least 45 days in advance.

14. Per state requirement, the subrecipient will schedule all students for a minimum of six
instructional hours per week. Instructional hours **must include both** in-person instruction
and distance learning counted using proxy contact-hour models (clock time, teacher
verification, learning mastery, as consistent with the NRS guidelines and OAE’s Assessment
Policy).

15. Per state requirement, grant funds may not be utilized to teach classes in any language other
than English, except as authorized by O.C.G.A. 50-3-100(d).

16. Per state requirement, the subrecipient agrees to utilize Blackboard to provide asynchronous
and synchronous standards-based instruction to all student populations. Blackboard
instruction must be of equivalent quality to face-to-face instruction.

17. Per state requirement, the subrecipient agrees to operate approved Integrated Education &
Training opportunities for students that meet the following requirements:
   a) The IET must: (a) meet the federal definition of IET as outlined in 34 CFR § 463.35 -38;
      (b) be aligned with regionally in-demand industry, and (c) support participants eligible to
      receive AEFLA services (WIOA Section 203(4) **which includes the eligibility
      requirement of “basic skills deficient”**.
   b) IET opportunities must be quarterly, meaning there are four unique opportunities each
      year. To receive an exemption from this requirement, a subrecipient must request a
      waiver from the Office of Adult Education.

18. Per state requirement, subrecipients may use up to $10,000 of their adult education grant
funds on training and certification costs associated with IET provided that: (a) the IET meets
items the conditions listed in 34 CFR § 463.35 -38; (b) the IET costs are allowable, allocable,
reasonable, and necessary, (c) the program is not supplanting other state or local funds, and
(d) if applicable, the program follows their conflict of interest and procurement policies when
selecting a training provider. Programs may use $10,000 out of their General Adult
Education grant (231/225/state), if applicable, and $10,000 out of their Integrated English
Literacy & Civics Education (IELCE) grant, if applicable If a program wishes to exceed the $10,000 limit, they must submit a written request to the Office of Adult Education.

19. The subrecipient will collaborate with other adult education subrecipients within a given Local Workforce Development Area to meet required one-stop partner responsibilities, including providing representation on the Local Workforce Development Board (LWDB) and negotiating and paying one-stop infrastructure costs (34 CFR § 463.400, § 463.415, § 463.420).

20. Programs designated to pay one-stop infrastructure costs must use a portion of their federal administrative funds to pay these costs. (34 CFR § 463.720)

21. The subrecipient will ensure that its services have a “direct linkage” to the one-stop centers in its assigned area. A “direct linkage” means that an interested student who learns of adult education through a one-stop center will be contacted directly (by phone call, web-based communication, etc.), within a reasonable time frame, by a program staff member who can provide information about its services. Please note that exclusively providing a phone number, website, information, pamphlet, or materials does not constitute a “direct linkage.”

22. Programs receiving funds for Family Literacy agree to the following requirements:
   a) Adults participating in the Family Literacy program must be eligible individuals as defined in WIOA Section 203(4) and go through the program’s standard intake procedures, including taking the relevant NRS-approved assessment(s).
   b) Per state requirement, children ages zero to thirteen can participate in the Family Literacy program provided that they are the children of family members or caregivers receiving adult education services.
   c) Per state requirement, children must participate in a minimum of 12 hours of Family Literacy programming.
   d) Per state requirement, subrecipients may use up to $8,000 of federal 231 funding to provide Family Literacy activities.
   e) When providing Family Literacy programming, subrecipients must attempt to coordinate with other programs and services prior to using AEFLA grant funds to support children or individuals not eligible for AEFLA services as defined in WIOA Section 203(4).

III. DATA REPORTING & INTAKE REQUIREMENTS
1. The subrecipient agrees to comply with all policies and procedures in the Office of Adult Education’s Assessment Policy.
2. The subrecipient agrees that it will meet the National Reporting System (NRS) of Adult Education data quality standards, including, but not limited to, the standards for academic performance, High School Equivalency (HSE) and transition goals.

3. To ensure accurate and detailed reporting and meet the performance accountability reporting requirements of the Workforce Innovation and Opportunity Act (WIOA) and the National Reporting System (NRS), subrecipients must make every effort to collect social security numbers for all Adult Education participants (including English Language Learners) without coercion.

4. Subrecipients must securely maintain personally identifiable information.

5. Subrecipients offering Integrated English Language & Civics Education (IELCE) or Family Literacy programs must make every effort to record and track the completion of goals related to those areas in the Georgia Adult Learner Information System (GALIS).