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Adult Education and the Workforce Development System

*Bureau of Postsecondary and Adult Education
Division of Adult Education Policy*

Subject: **Adult Education and the Workforce Development System**
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POLICY STATEMENT

As the entity that administers federal funds awarded to the commonwealth under the Adult Education and Family Literacy Act, Title II of the Workforce Innovation and Opportunity Act (WIOA), the Pennsylvania Department of Education Division of Adult Education (division) requires all grantees receiving federal funding through an Adult Basic Education Direct Service 064 grant or an Integrated English Literacy and Civics Education Program 061 grant to be partners in the local one-stop centers, called PA CareerLink® in Pennsylvania, and delegates to them all of the roles and responsibilities of the one-stop partners as laid out in WIOA statute and regulations.

PURPOSE

This policy ensures commonwealth compliance with WIOA regulations. §463.415(b) of [WIOA: Joint Rule for Unified and Combined State Plans, Performance Accountability, and the One-Stop System Joint Provisions — Final Rule](#) identifies the state agency that administers Title II funds as the required partner in the one-stops in the local areas and gives that agency the authority to delegate the related roles and responsibilities to local providers.

GUIDANCE

Roles and Responsibilities of the PA CareerLink® Partner

§463.420 of [WIOA: Joint Rule for Unified and Combined State Plans, Performance Accountability, and the One-Stop System Joint Provisions — Final Rule](#) identifies the following roles and responsibilities of the one-stop partners:

1. Provide access to programs and activities through the PA CareerLink® one-stop delivery system, in addition to other appropriate locations;
2. Provide career services allowable with funding under Title II;
3. Contribute to PA CareerLink® infrastructure costs;

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4. Work collaboratively with the local workforce board (LWDB) to establish and maintain the PA CareerLink® one-stop delivery system;
5. Enter into a negotiated Memorandum of Understanding (MOU) with the LWDB relating to the operation of the PA CareerLink® one-stop delivery system;
6. Participate in the operation of the PA CareerLink® one-stop delivery system consistent with the terms of the MOU; and
7. Provide representation on the LWDB and participate on LWDB committees as appropriate.

Local Program Fulfillment of Partner Roles and Responsibilities

In local workforce areas with a single entity that has a federally funded grant from the Division of Adult Education, that entity must be the PA CareerLink® partner and must fulfill all of the partners' roles and responsibilities at all of the comprehensive sites in the local area.

In local workforce areas with multiple entities that have federally funded grants from the Division of Adult Education, those entities must work as a coalition to fulfill the roles and responsibilities at all of the comprehensive sites in the local area. A grantee in a local area with multiple providers may not negotiate an MOU independently with the LWDB. Nor may a subset of grantees negotiate the MOU with the LWDB without first having agreed to a plan with all of the grantees. All grantees must sign the MOU, contribute to infrastructure costs, provide access to services through the PA CareerLink® one-stop delivery system, and provide career services. The level of involvement and contributions of individual grantees in the coalition will vary depending on the size of the program and its proximity to a PA CareerLink®, and not all providers need be connected to all PA CareerLink® sites. However, as a coalition, the adult education programs must ensure that all roles and responsibilities are met.

Grantees providing services in multiple local workforce areas must meet the roles and responsibilities of a PA CareerLink® partner in all local areas in which services are provided.

Where appropriate, grantees with subgrantees should include the subgrantees in negotiations. As appropriate, subgrantees may sign the MOU and contribute directly to PA CareerLink® infrastructure costs. If a subgrantee serves as a PA CareerLink® partner on behalf of the main grantee, the details must be clearly outlined in the written contract between the subgrantee and the main grantee, and both the main grantee and subgrantee will sign the MOU.

Representation and Participation on the LWDB

Each LWDB must include a representative of Title II-funded adult education programs. The Title II representative may be from any entity receiving Title II funds, including subgrantees. The Title II representative must attend LWDB meetings and report on adult education services. Other staff from adult education programs are encouraged to attend LWDB meetings as members of the public and join board subcommittees, as appropriate.

When selecting the Title II representative for LWDB membership, local officials in local areas with multiple adult education programs are expected by WIOA to solicit nominations from those programs of an individual to serve as the representative. The selected individual represents all of the programs in the local area and must report back to them the content of the LWDB meetings at regularly scheduled meetings.

Adult education programs in a local area must coordinate services to align activities with the local plan and must remain current on the activities of the LWDB and other workforce partners.

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They must provide, at least annually, a collaborative report on workforce development planning with WIOA partners to the LWDB. A copy of the collaborative report must be sent to the division.

Summary of Key Points from Federal Guidance

The federal agencies overseeing the programs that are required partners in the one-stop delivery system issued joint guidance regarding operations of the one-stop delivery system. *Program Memorandum, OCTAE 17-4: One-Stop Operations Guidance for the American Job Center Network* applies to programs funded under Title II of WIOA. The following content summarizes key points from the guidance but does not supersede the guidance.

Access to Services

PA CareerLink® partners must provide access to their programs and services at the PA CareerLink® site, and that access must be available during regular business hours. For these purposes, “access” means that a PA CareerLink® client must be able to receive meaningful information about adult basic education services available in the local area through the PA CareerLink® site. WIOA regulations provide three options for meeting this requirement:

- 1. Adult basic education program staff physically located at the PA CareerLink® site:** The adult education program(s) have one or more of their own staff members located full time at the PA CareerLink® site to provide information to clients about adult basic education services.
- 2. Other program partner staff located at the PA CareerLink® site trained to provide information on adult basic education services:** Adult education programs train one or more staff members of other partner programs who are physically located at the PA CareerLink® site (e.g., Title I or TANF program staff) to provide complete and accurate information about adult basic education programs, services, and activities available in the area. In this case, the adult basic education programs should compensate the partner programs for their staff members’ time.
- 3. Direct linkage through technology to the adult education program:** Direct linkage provides direct communication at the PA CareerLink® site in a reasonable time by telephone or real-time web-based communication to an adult basic education program staff member who can provide adult education program information or services to the client. The client should not automatically get an answering machine to leave a message. Direct linkage does not mean providing a phone number, website, flyers, pamphlets, brochures, or other materials.

Programs can use any one or a combination of these options to meet the requirement to provide access.

Career Services

PA CareerLink® partners must make the career services applicable to adult education activities available through the PA CareerLink® one-stop delivery system, either at the PA CareerLink® site or at any other appropriate location. Appropriate locations for division-funded programs include all sites at which the adult education program provides services.

Program Memorandum OCTAE 17-2 Performance Accountability Guidance for Workforce Innovation and Opportunity Act, Attachment 7 Table C identifies the five career services applicable to adult basic education under Title II:

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1. Outreach, intake, and orientation information;
2. Initial assessment of skill levels including literacy, numeracy, and English language proficiency, as well as aptitudes, abilities, and supportive services needs;
3. Referrals to and coordination of activities with other programs and services;
4. Provision of performance information and program cost information on eligible providers of education, training, and workforce services by program and type of provider; and
5. Provision of information on availability of supportive services or assistance and appropriate referrals (including child care; child support; medical or child health assistance available through the State's Medicaid program and Children's Health Insurance Program (CHIP); Supplemental Nutrition Assistance Program (SNAP) benefits; Earned Income Tax Credit (EITC); assistance under the Temporary Assistance for Needy Families (TANF) program; and other supportive services and transportation).

Memorandum of Understanding

Content

The MOU is an agreement developed and executed by the LWDB and the PA CareerLink® one-stop delivery system partners. It is the product of local discussion and negotiation. Key components include:

1. A description of the services provided through the PA CareerLink® one-stop delivery system, both on and off site, including:
 - a. How access will be provided to those services;
 - b. A description of the coordinated delivery of services at the PA CareerLink® site; and
 - c. Methods for referring individuals to appropriate services and activities. Referrals should be made from the PA CareerLink® to off-site services and from off-site services to the PA CareerLink®, as appropriate.
2. The PA CareerLink® operating budget;
3. Provisions specifying the duration of the MOU and procedures for amending the duration; and
4. Process for amending the MOU, including changes to the infrastructure cost contributions.

For Pennsylvania-specific requirements for the MOUs refer to Pennsylvania Department of Labor & Industry [WSP No. 121-03 Memorandum of Understanding \(MOU\) for the One-Stop Delivery System](#).

Operating Budget

The federal agencies overseeing the programs that are required partners in the one-stop delivery system issued joint guidance regarding operating costs of the one-stop delivery system. *Program Memorandum, OCTAE 17-3: Infrastructure Funding of the One-Stop Delivery System* applies to programs funded under Title II of WIOA. The following content summarizes key points from the guidance but does not supersede the guidance.

All PA CareerLink® one-stop delivery system partners are required to share in the costs of career services (see "Career Services" above) and contribute to infrastructure costs. Infrastructure costs are non-personnel costs necessary for the general operation of the PA CareerLink® site. They include the costs of the rental of the facility; utilities and maintenance; equipment, including assessment-related products and assistive technology for individuals with disabilities; technology to facilitate access to the PA CareerLink® site, and the use of the common identifiers America's Job Center and PA CareerLink®. Infrastructure costs include

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supplies to support the general operation of the PA CareerLink® site, as well as any service contracts with vendors that are used to support the system. PA CareerLink® partners also may contribute to other shared costs necessary to run the PA CareerLink® one-stop delivery system. Such costs include the operator costs; personnel costs for the PA CareerLink® administrator, receptionist, or front desk staff; and the costs of the business services team.

Financial contributions to the PA CareerLink® operating budget must be negotiated and agreed upon. All contributions are governed by the statute, by the regulations that support the statute, and by the *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance). All costs incurred by adult education programs under the MOU must be allowable under Title II of WIOA and related regulations, and be reasonable, necessary, and allocable. Adult education programs may not use grant funds to pay for items or activities that are not allowable under Title II of WIOA or Uniform Guidance.

PA CareerLink® partners contribute to costs based on their proportionate use and relative benefit of participation in the PA CareerLink® site. LWDBs and PA CareerLink® partners are required to periodically review actual proportionate use and relative benefit and adjust programs' contributions, if necessary. Contributions may be cash, non-cash, or third-party in kind. Non-cash and in-kind contributions must be of the same category as the category of cost.

TOOLS

Workforce activities in Pennsylvania are supported by the Workforce Development Support Liaison Project. Division-funded adult education programs should take advantage of all available technical assistance provided by Workforce Project staff to align services with local workforce plans and coordinate with the programs and services of the workforce system partners. The Workforce Project provides comprehensive technical assistance on working as part of adult education coalitions, working with the LWDB, and working with partners. For more information, contact your division advisor or the Workforce Development Liaison.

Additional Resources

United States Department of Education, Office of Career, Technical, and Adult Education (OCTAE) documents

- [Program Memorandum OCTAE 17-2 Performance Accountability Guidance for Workforce Innovation and Opportunity Act, August 23, 2017](#)
- [Program Memorandum, OCTAE 17-3: Infrastructure Funding of the One-Stop Delivery System, January 18, 2017](#)
- [Program Memorandum, OCTAE 17-4: One-Stop Operations Guidance for the American Job Center Network, June 16, 2017](#)

Pennsylvania Department of Labor & Industry policies

- [WSP No. 121-06 \(C1\) Local Workforce Delivery System - Common Identifier Policy](#)
- [WSP No. 121-05 Local Workforce Delivery System - PA CareerLink® Certification and Continuous Improvement](#)
- [WSP No. 121-03 Memorandum of Understanding \(MOU\) for the One-Stop Delivery System](#)