

# DRAFT

## Adult Education and Family Literacy Guidelines Program Year 2020-21

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For services offered with the following funding:

Pennsylvania Act 143 of 1986, Title 24, Chapter 31  
Adult and Family Literacy Education Act

Workforce Innovation and Opportunity Act of 2014, Title II (Federal Adult Education and  
Family Literacy Act)

*July 2020*



**COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF EDUCATION**

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## 100 General Information

### 101 Purpose of Funding

#### 101.1 Federal

The purpose of the funding in Title II of the [Workforce Innovation and Opportunity Act \(WIOA\)](#), also known as the Adult Education and Family Literacy Act (AEFLA), is to create a partnership among the federal government, states, and localities to provide, on a voluntary basis, adult education and literacy activities, in order to:

1. Assist adults to become literate and obtain the knowledge and skills necessary for employment and economic self-sufficiency;
2. 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;
3. Assist adults in attaining a secondary school diploma and in the transition to postsecondary education and training, including through career pathways; and
4. 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.

#### 101.2 State

[Pennsylvania Adult and Family Literacy Education Act 143](#) (Act 143) aims to provide coordination and broaden the scope of educational activities to uneducated and undereducated adults in the commonwealth and their families, including those who speak other languages, and to provide programs to those individuals who have previously been unserved. The goals of the Act include:

1. Increased and improved services to adult learners and their families through the coordination of funding streams and programs across state agencies; and
2. Increased and expanded adult and family literacy education programs so that adults and their families will function more effectively in their personal lives and as citizens and be better prepared for workforce training and employment that they may become more responsible and productive members of society.



Under state Act 143, adult and family literacy education providers may apply to the Pennsylvania Department of Education (PDE) for grants to provide the following services:

1. Adult literacy education programs for eligible adults;
2. Family literacy education programs for eligible parents and their children;
3. Training for volunteer adult literacy education instructors; and
4. Administration, support services for learners, and outreach activities.

## **102 Statutory State-Level Requirements**

### **102.1 Federal**

1. No less than 82.5 percent of the total state allocation may be earmarked for direct service grants to eligible providers.
2. No more than 20 percent of the funds earmarked for direct service grants may be spent for services at correctional facilities; prison, jail, reformatory, work farm, detention center, halfway house, community-based rehabilitation center, or any other similar institution designed for the confinement or rehabilitation of criminal offenders;
3. No more than 5 percent of the grant funds or \$85,000, whichever is greater, may be used for state administrative expenses.
4. No more than 12.5 percent of the total state allocation may be used for state leadership activities.
5. At least 25 percent of a non-federal contribution (match funds) must be used for adult education and literacy activities.

### **102.2 State**

1. No more than 20 percent of the annual state appropriation shall be used to provide education to institutionalized adults.
2. No more than 20 percent of the annual state appropriation shall be used for programs of equivalency for certificate of graduation from a secondary school.
3. At least 20 percent of the annual state appropriation shall be used for training volunteer adult literacy education instructors.
4. At least 25 percent of the annual state appropriation shall be used for family literacy education programs.

## **103 Non-duplication of Services**

Adult education and family literacy programs, services, or activities provided under this federal and state funding must be coordinated with, but not duplicate, programs, services, and activities made available to adults under other sources of federal, state, and local funding for education, training, corrections, public housing, and social service programs. Furthermore, federal funds must be used to supplement, not supplant, other state or local public funds expended for adult education and literacy activities. [Reference WIOA Sec. 241 (a)]

## 104 Application Procedures

All grant applications for funding through PDE Division of Adult Education (the division) must be completed in [eGrants](#). Specific application instructions are provided in the associated Request for Grant Applications for competitive grants or Renewal Application guidelines for renewal grants. Each application has a corresponding submission deadline. Applicants must adhere to all specified deadlines. No grant applications will be accepted after published application due dates.

## 200 Program Operations

### 201 Board of Directors

Pennsylvania law requires nonprofit entities to be governed by a policy-making board, with either appointed or elected representatives from the public and private sectors of the community. If the provider is a school district, intermediate unit, career and technical center, or institution of higher education, the board that governs the overall institution serves as the board for the purpose of this program.

### 202 Health, Safety, and Accessibility

All public and private sites used to provide adult basic education, family literacy, and early childhood education are required to meet the current health, safety, and accessibility standards as established by applicable federal, state, local, and PDE laws, regulations, and guidelines. Adult education and family literacy programs suspected of being in violation of these policies may be closed for investigation. The site may be closed permanently based upon the findings of the investigation. (Reference [Policy C.900](#))

### 203 Eligible Adults

WIOA and Act 143 each establish eligibility requirements for participants. Local programs may not impose any additional eligibility requirements that further restrict access to division-funded programming.

#### 203.1 Federal

Individuals who meet the following criteria in Sec. 203(4) of WIOA are eligible for federally-funded adult education services:

1. Have attained 16 years of age;
2. Are not enrolled or required to be enrolled in secondary school under state law; and
3. Who:
  - a. Are basic skills deficient;
  - b. Do not have a secondary school diploma or its recognized equivalent, and have not achieved an equivalent level of education; or
  - c. Are English language learners.

Students who are enrolled in postsecondary education may participate in federally-funded adult basic education services, as long as those services do not exceed the pre-college level.

### 203.2 State

Individuals who meet the following criteria in section §6403 of the Pennsylvania Adult and Family Literacy Education Act 143 are eligible for state-funded adult basic and/or family literacy education services:

1. Is 17 years of age or older;
2. Is a resident of Pennsylvania; and
3. Is not currently enrolled in a public or private secondary or postsecondary school.

### 203.3 F-1 Visa

In accordance with Section 625 of Public Law 104-208, foreign students with an F-1 visa are prohibited from enrolling in any division-funded adult education or family literacy program. Programs must provide all prospective students with sufficient notice of this prohibition to allow affected individuals to self-report. The division strongly recommends that programs present the F-1 visa statement to all prospective students during orientation, include the statement in the student handbook, and post the statement in common areas. (Reference [Policy C.800](#))

## 204 Program Staffing

Adult education and family literacy programs must be able to comply with all of the requirements of the state and federal grants. Programs are required to maintain certain program staffing to ensure the quality of grant administration; supervision; data collection, entry, and reporting; student support; and instruction. All staff must be properly qualified to fulfill the duties listed in their written job description through training, education, or experience. All staff must complete required training and professional development activities as per [Policies C.135, C.330, D.100, D.160, and F.100](#).

Program administrators, program coordinators, and all tutor training/coordination, instructional, and student support staff must have a minimum of a bachelor's degree from an accredited postsecondary institution or equivalent foreign credential. Instructors who are teaching high school level mathematics (level E of the [College and Career Readiness Standards for Adult Education](#)) must have secondary math teaching certification or a bachelor's degree or higher that ensures knowledge of all content required in the [Subject Specific Program Guidelines for PA Mathematics 7-12 certification](#). Early childhood education instructional staff in family literacy programs must have a bachelor's degree in a field related to early childhood, elementary, or secondary education. Data quality specialists must have a bachelor's degree or a postsecondary credential related to data management and use. Individuals without the required credentials who were in these positions in a program funded by the division prior to the beginning of the current grant cycle will be grandfathered for the same position during this grant cycle. These individuals may not be promoted or transferred to other positions in the division-funded program that require a bachelor's degree without the required credential.

The division does not require any of the following positions to be full-time, dedicated positions. Some programs may find it necessary to have a single staff person fulfill the duties of more than

one position (e.g., tutor coordinator and instructor). However, the division strongly recommends that, whenever possible, programs have dedicated staff members for the individual positions.

### **204.1 Program Administrator**

The program administrator is responsible for the overall day-to-day coordination, administration, and instructional leadership of the adult and/or family literacy education program. The program administrator must be a full-time employee of the grantee agency. The program administrator does not need to be full-time on Division of Adult Education grants but must have sufficient time allocated to fulfill the required duties related to those grants. These duties include, but are not limited to, ensuring compliance with division policies; providing adequate staffing; providing new staff with program-specific orientation; providing fiscal oversight; providing leadership in program improvement/professional development; maintaining contact with institutions of postsecondary education and training, local businesses, and community service organizations; and coordinating adult basic education services with local workforce development system partners. (Reference [Policy G.100](#))

### **204.2 Student Support Coordinator**

The student support coordinator must be given sufficient dedicated time to fulfill the related responsibilities. The person must be available as needed to work with any student enrolled in the adult education or family literacy program. The duties include, but are not limited to, participating in program orientation; reviewing goals and analyzing assessments; coordinating with instructors and volunteer tutors; making referrals to other community resources/programs; assisting with addressing barriers to attendance, such as childcare and transportation; providing access to resources to assist with transition to workforce or postsecondary education/training; and documenting student support activities and hours.

### **204.3 Classroom Instructor**

Classroom instructor responsibilities include lesson planning, instruction, professional development, and program improvement efforts. Instructors are also responsible for providing supplemental computer-based distance learning opportunities to interested students in their classes per division policy. Other duties include, but are not limited to, periodically reviewing goals, adjusting student placement, if needed, and coordinating with the student support staff. The program must ensure that classroom instructors receive adequate time for lesson planning and professional development. (Reference [Policy D.130](#))

### **204.4 Data Quality Specialist**

Data quality specialists must have data entry skills, knowledge of the assessments used by the program, training in use of the eData v2 system, and a complete understanding of services offered by the program to ensure accurate data entry. The duties include, but are not limited to, overseeing data collection and entry for the program; ensuring timely, complete, and accurate entry of data; performing regular review of data for errors; and ensuring immediate corrections, when needed. Data quality specialist is not a clerical role. Therefore, programs are encouraged to have several additional staff members trained in data entry.

## **204.5 In-House Professional Development Specialist**

The in-house professional development specialist should be a proven, effective instructor as evidenced by data that demonstrates student gains above the state average and should be spending at least 2% of their time in direct student instructional service. This person works with other staff to develop and implement individual professional development plans in coordination with the program improvement and professional development worksheet. Duties include, but are not limited to, coordinating professional development activities within the program, supporting staff in implementing new skills and knowledge, and working closely with the professional development system and the program director around instructional quality. This role cannot be filled by the program administrator.

## **204.6 Tutor Coordinator**

Tutor coordinators provide training and support to volunteer instructors/tutors and classroom aides. The duties include, but are not limited to, implementing effective processes for tutor screening, making referrals to the student support coordinator, participating in orientation, conducting training sessions, assigning and supporting tutor-student pairs/groups, providing ongoing supervision of tutoring staff and working with the in-house professional development specialist to coordinate tutor professional development. This position is not required for those programs that only provide family literacy services.

## **205 Program Accountability**

### **205.1 Data Collection, Entry, and Reporting (Reference Policy C.130)**

**Collection:** Programs must collect complete and accurate student intake information; assessments, including appraisals/locators for paper-based assessments; and third-party release forms and retain the documentation in student files. Attendance hours may be kept in student files, in attendance binders by class, or in a central electronic storage folder by class.

**Entry:** Timely data entry allows program staff and the Division of Adult Education to analyze data on a regular basis and use it for program planning and continuous program improvement. Programs are required to enter data in the eData v2 system per division policy. Programs must periodically review data checklists provided by eData Support and make corrections as needed. Programs must be able to provide documentation for all data to the division on request.

**Reporting:** The Data Quality Validation Form must be submitted to the division by the annual deadline.

### **205.2 Contracted Enrollment**

Programs contract for a specific number of participants when they submit a grant application. (See Policy C.100 for participant criteria.) Programs over or under enrolling students by significant numbers will be out of compliance with the grant agreement, which may result in conditions being placed on grant awards.

While the division does not prohibit students from being served in more than one grant during a program year, these students will only be counted once when calculating total grant enrollments

at the end of the program year. For performance purposes, the determining factor when selecting which grant (064, 054, or 061) such students will be placed in will be the grant in which the student had the most contact hours. A student with multiple periods of participation will only count as one enrolled student.

Programs are expected to serve their contracted number of participants. Over-enrollment can be avoided by appropriate pre-screening during the intake and orientation process and efficient class scheduling. Individuals who are not classroom ready or who are unable to enroll due to capacity constraints should be placed on a waiting list.

### **205.3 Program Performance**

Programs are expected to meet all division-imposed outcome performance targets. These targets have been established by the Division of Adult Education based on previous state performance results. Programs will receive annual performance data that should be used for program improvement initiatives. Consistently poor results in a majority of primary indicators of performance may result in the loss of funding. (Reference [Policy C.100 and C.135](#))

### **205.4 Responsibilities of the Main Grantee in a Consortium**

In cases in which a consortium of agencies is awarded a grant, the main grantee subcontracts a portion of the grant funds to other entities (the “subgrantees”) to provide adult education and/or family literacy services. All entities in the consortium are expected to work together to coordinate services. All entities in the consortium must abide by federal and state laws and regulations governing the funds, the PDE Master Standard Terms and Conditions, the *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*, and Division of Adult Education policies and guidelines.

The main grantee in a consortium:

1. Must have a written contract in place with the each subgrantee that includes a formal budget and assurances that subgrantees will adhere to all required laws and regulations.
2. Is responsible for providing subgrantees(s) with all pertinent division information.
3. Will ensure that the subgrantees adhere to all state and federal funding policies and guidelines and provide all activities required by the grant.
4. Will regularly meet with and monitor subgrantees, including, but not limited to, observation of classes, fiscal and data review, review of the required policies, and review of student files.
5. Is responsible for the performance of, and any violations of guidelines and policies by, the subgrantee(s).

Main grantees must abide by all requirements for subcontracting in the PDE Standard Terms and Conditions and the federal *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*.

After initial award of a grant, subgrantees may be removed from the grant contract for cause with division approval. The main grantee will have to provide a rationale for the proposed removal of a subgrantee and a plan to replace the services provided by the subgrantee.

### **205.5 Monitoring and Evaluation of Adult Education and Family Literacy Programs**

The Division of Adult Education will regularly monitor programs for contractual, legal, fiscal, and programmatic compliance. Programs must notify the division of any changes to approved contracts made during the program year.

### **205.5.1 Desk Monitoring**

Division advisors regularly review programs' data in e-Data and division quarterly fiscal reports. Programs will be contacted if there are late reports, errors in the reports, or anomalies in the program data. Programs must be able to provide documentation for all data to the division on request.

### **205.5.2 Monitoring Visits**

Division advisors will schedule monitoring visits based on annual program review using a risk rubric. Additional visits may be scheduled as a result of issues that come to the division's attention. Prior to a monitoring visit, the program will receive a monitoring tool to guide preparation for the monitoring visit and will work with the division advisor on an agenda. The risk rubric and monitoring tool are available on the [PDE website](#).

A team of advisors will conduct the monitoring visit, which includes, but is not limited to:

1. Review of fiscal records and student files;
2. Interviews with administrator, staff, and students;
3. Classroom instruction observations; and
4. Site visits – including subgrantee sites.

Any noteworthy practices, findings, and recommendations will be presented at a closing meeting. Programs will have 45 days from receipt of the official findings report to provide a corrective action plan. A follow-up visit by the advisor may be necessary to confirm that all findings have been addressed. Continued failure to make the necessary corrections will result in disciplinary action and may result in a loss of funding.

### **205.6 Required Policies**

PDE requires agencies to have the following policies for the adult education and family literacy program:

1. Student Attendance Policy – see guidelines section 402.5
2. Data Collection and Entry Policy – see Policy C.130
3. Assessment Policy – see Policy D.100
4. Access, Orientation, and Intake Policy – see guidelines section 301

All policies should include procedures that provide agency-specific information on how these policies will be implemented. In addition to these division-required policies, agencies must have any additional policies required by law, statute, and regulation.



## **300 Program Services**

### **301 Student Access, Orientation, and Intake**

All division-funded programs must provide access to their programs and services at the PA CareerLink® site (see Policy G.100). Programs must provide all students with an orientation session to explain program services, eligibility, and rules. Student orientation must include time for program overview, barrier screening, transition goal setting, intake, and assessment. Programs are encouraged to provide program overview, barrier screening, and transition goal setting first and complete assessment and intake after these are completed. With the exception of time spent on initial administration of standardized assessment(s), student orientation activities do not count towards instructional hours. Programs must have an Access, Orientation, and Intake Policy and Procedures that includes all of the information in this section.

#### **301.1 Program Overview**

Programs must ensure that all students, including English language learners, understand the information provided at orientation. During orientation sessions the following should be covered:

1. Attendance policy and class participation;
2. Student handbook that provides information on fire drills, emergency evacuation procedures, grievance procedures, rights and responsibilities, and basic program rules and regulations;
3. Opportunities for supplemental computer-based distance learning opportunities provided by the program;
4. Services of the Statewide Distance Learning Project for students unable to attend face-to-face instruction opportunities;
5. Class schedules, including tutoring options if applicable; and
6. Other program-specific information.

#### **301.2 Barrier Screening**

Programs must include time during orientation to work with students to identify and develop a plan to address potential barriers to participation. Student success in the program is predicated on the recognition of and solutions to these barriers. Programs should provide students with information on local community and support service providers and help students access those services as needed.

#### **301.3 Initial Transition Goal Setting**

Students must have the opportunity to discuss their educational and career goals and develop a related plan during the orientation process. This information must then be shared with the student support coordinators and instructors, so they can plan services that align with and address the goals and plans. During the initial transition goal setting, programs should provide students with information on available employment and postsecondary/training opportunities, including Pennsylvania CareerLink® services.



### 301.4 Intake

Programs must use the current year eData v2 forms for collecting student information in accordance with the [Technical Assistance Guide for Performance Accountability under the Workforce Innovation and Opportunity Act](#) (Chapter III. The NRS Data Collection Process). The program must accurately collect all of the information that is required on the eData form. Intake forms must be included in the student files.

1. For the purpose of conducting data matching for federal and state reporting, programs should ask adult students to provide their Social Security number on the intake form. However, individuals are not required to provide their Social Security number in order to participate in the program. Programs cannot require a Social Security number and cannot deny services to students who do not provide a Social Security number.
2. Students must sign the Release of Information statement at the end of the Adult Intake/Exit form. In order to share student information with other entities, programs must also have a signed third-party release of information form in the students' files.
3. Students must be provided with emergency information forms, which they will have the option to fill out.
4. Orientation staff must present the F-1 visa statement to all students.
5. Programs must enter student information into the eData v2 system once the student has completed the intake form and pretesting.
6. During intake, programs should try to find out if the individual previously participated in an adult education or family literacy program. This information can help with barrier screening and proper assessment.

### 301.5 Assessments

Students must be assessed with one of the approved standardized assessments before entering instruction. Student files must include documentation of the approved standardized assessment used for division reporting purposes. (Reference [Policy D.100 and D.120](#))

Diagnostic information from the assessment should be presented to the student, student support coordinator, and instructor. This information should be used to place students in the most appropriate instructional/class level and to inform instruction and student support services.

### 301.6 Referrals to the Distance Learning Project

Programs must provide information about distance learning opportunities during orientation. Students who are unable to participate in services at the local program should be referred to the Statewide Distance Learning Project. Students who want to participate in supplemental distance learning opportunities in addition to attending real-time instruction at the local program should be provided with those activities by their classroom teachers. The local program should prepare and support such students to succeed in the distance learning activities.

## 302 Student Support Services

Programs are required to provide all students with barrier and transition support services. These may be provided individually or in a group setting. The program must have the capacity to provide one-on-one confidential support to students when needed. Support services must be

offered at flexible times to meet the needs of students; however, support staff should limit how often they pull students out of class, as this interrupts instruction. Programs must post a schedule indicating the days and times that support services are available to students. Note: Students support services are not instruction, and time students spend receiving student support services may not be entered in eData as attendance hours.

### **302.1 Student Support Coordinator**

The division strongly recommends that the student support services be provided by one or more dedicated staff positions. When this is not financially feasible, however, programs may have a staff member who serves in another position also be the student support coordinator. The student support coordinator must be given sufficient dedicated time to fulfill the related responsibilities. Requirements for student support services include, but are not limited to the following:

1. Services must be made available in individual, small group, online, or classroom settings that meet the schedule demands of students;
2. Services must be provided in a venue that is conducive to the type of support services being offered;
3. Barrier and transition support services must be an integral part of the orientation process;
4. Services must be provided in collaboration and consultation with classroom and volunteer instructors;
5. Services must be provided in collaboration with local community and support service providers, including resources for dependents;
6. Programs must collect information, including contact information, about postsecondary education and training opportunities and make the information available to students as appropriate;
7. Student support coordinators must be aware of the local workforce board activities, the local plan, and local labor market information, and understand how they impact students;
8. Programs must use appropriate barrier support and learning differences assessment tools;
9. Program staff must follow up with students who have missed class, disclosed additional need for assistance, etc.;
10. Programs must maintain confidentiality of all written documentation and records of student support sessions; and
11. Services must incorporate relevant workforce preparation activities.

### **302.2 Barrier Support**

Barrier support is designed to help students proactively identify issues that could prevent regular class attendance or interfere with their educational progress and to provide upfront support to address those issues. Support staff should provide contact information to relevant community and support service agencies but allow the student to reach out for the support. (Staff time spent on barrier screening and support must be reported in Function Code 2160.)

### **302.3 Transition Support**

Transition support is designed to help students identify their goals for postsecondary education/training and/or employment, establish a plan to reach those goals, and complete the steps in the plan. Students should be actively engaged in learning about career pathways. (Staff time spent on transition goal setting and support must be reported in Function Code 2122.)

## 400 Instruction

Federal and state funds permit instruction for:

1. Adult education;
2. Literacy;
3. Workplace adult education and literacy;
4. Family literacy (state funds only);
5. English language acquisition activities;
6. Corrections education;
7. Integrated English literacy and civics education;
8. Workforce preparation activities; and
9. Integrated education and training (federal funds only).

## 401 Quality of Instruction

At a minimum, quality instruction will:

1. Be grounded in research;
2. Incorporate the *College and Career Readiness Standards for Adult Education*;
3. Be provided by qualified staff;
4. Be contextualized; and
5. Incorporate technology.

## 402 Instructional Requirements

### 402.1 Instructor Preparation Time

Classroom and volunteer instructors/tutors must be given adequate time for professional development and classroom preparation. This time must be protected and cannot be used for performing other duties. Classroom instructors must receive a minimum of 20 percent of their total time for preparation and professional development. Programs are strongly encouraged to provide more than 20 percent of total time for these activities.

### 402.2 Language of Instruction

Instruction provided with funds from the division must be delivered in English.

### 402.3 Intensity of Instruction

Grantees must use a variety of instructional delivery methods, including in-person instruction and distance learning options, to support students' access to instruction of sufficient intensity to achieve educational gain in a timeframe that meets students' needs and supports Pennsylvania to achieve its negotiated levels of performance..

### 402.4 Occupational/Vocational Training

Programs cannot provide occupational/vocational training to students as part of regular, division-grant-funded classes, unless it is part of a division-approved integrated education and training program. (See 403.1.4)

### 402.5 Student Attendance

Regular student attendance is essential to ensure that students persist in the program long enough to reach their goals. To accomplish this, programs must have a written, enforced attendance policy and procedures that includes:

1. Attendance requirements for in-person classes, remote real-time classes, hybrid/blended classes, and distance learning;
2. Consequences for students who fail to meet the attendance requirements;
3. A process to document and track actual student attendance hours;
4. Specific procedures to follow up on student absences; and
5. The provision of barrier support services.

### 402.6 Standards-Based Instruction

Standards-based education provides a structured approach for adult basic education and family literacy programs to create a system that explicitly links standards, assessments, and instructional delivery. PDE's Standards Aligned System (SAS) is the comprehensive system to support student achievement across the commonwealth. The Pennsylvania Core Standards, adopted in 2013, reflect the organization and design of [the Pennsylvania Academic Standards](#).

The Division of Adult Education has implemented the [College and Career Readiness Standards for Adult Education](#) (CCRS) that were released by the federal Office of Career, Technical, and Adult Education (OCTAE). The CCRS are fully aligned with the Pennsylvania Core Standards. These standards must guide lesson planning and instruction.

### 402.7 Career Pathways

The role of division-funded programs in career pathways is to support students' access to and success in career pathways, especially those identified in the local workforce plan. Programs help students acquire the knowledge and basic skills, including critical thinking and problem solving, necessary to earn a secondary school credential and transition to and succeed in employment and/or postsecondary education or training. Furthermore, programs should coordinate with local partners to assist in the development of career pathways and ensure on-ramps for students in adult basic education programs.

As defined in WIOA, the term career pathway means a combination of rigorous and high-quality education, training, and other services that:

1. Aligns with the skill needs of industries in the economy of the state or regional economy involved;
2. Prepares an individual to be successful in any of a full range of secondary or postsecondary education options, including registered apprenticeships;
3. Includes counseling to support an individual in achieving the individual's education and career goals;
4. Includes, as appropriate, education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster;

5. Organizes education, training, and other services to meet the particular needs of an individual in a manner that accelerates the educational and career advancement of the individual to the extent practicable;
6. Enables an individual to attain a secondary school diploma or its recognized equivalent, and at least one recognized postsecondary credential; and
7. Helps an individual enter or advance within a specific occupation or occupational cluster.

## 402.8 Lesson Plans

All instructors, including volunteer instructors/tutors and individuals providing the occupational training component of an integrated education and training activity, must use documented lesson plans with CCRS-aligned learning objectives that integrate workforce preparation activities and promote acquisition of digital literacy skills. The lesson plans must clearly articulate how the teacher will sequence lessons, use instructional materials, and present and conduct learning activities. Curriculum and instructional strategies should make career awareness and workforce skills a central context for learning.

## 402.9 Learning Difference Materials

Teachers must be able to adjust lesson plans in response to the needs of their students, including those with learning differences. Programs must have “classroom toolkits,” which contain the most commonly used adaptive materials, and must place these toolkits where the students can access the materials when they need them. Teachers and tutors must be familiar with additional adaptive materials to provide when students require resources that are not in the classroom toolkit.

## 403 Instructional Models and Delivery Methods

The instructional models recognized by the Division of Adult Education are managed enrollment, open entry/open exit, supplemental instruction, and tutoring. Agencies should choose models that provide sufficient intensity of instruction to promote steady educational gain and that best meet the needs of the targeted student population. Instruction may be delivered in person or at a distance. All distance education must be provided in a manner compliant with Policy D.130 Distance Learning. Although agencies are free to select the models that will be used, the division is committed to increasing the number of managed enrollment classes offered statewide.

### 403.1 Managed Enrollment

Managed classes have an established cycle with a start and end date. Students are only allowed to enter the class at the beginning of the cycle and are expected to remain until the end. This model is especially beneficial in preparing students for the structure and requirements of postsecondary education/training.

#### 403.1.1 Fast Track High School Equivalency Preparation

Fast Track High School Equivalency Preparation is a managed class for students who need short-term instruction (at least 12 hours) in one or two content areas in order to successfully complete the high school equivalency tests. Eligible students must be functioning at an Adult Secondary Education (ASE) level.

### **403.1.2 Specialized (Short Term)**

Specialized classes are created to address specific needs in the community, including the demands of the local labor market, and should be responsive to student needs. Specialized managed classes provide focused instruction in specific content areas, such as writing, math, health literacy, financial literacy, English-as-a-Second-Language (ESL) conversation, postsecondary transition or workforce education. Specialized classes must be offered for a minimum of 12 hours. Programs must maintain an enrollment of a minimum of eight adult learners in these classes. Specialized classes must be cost-effective, based on the expenses necessary to support the class, and offered as needed.

### **403.1.3 Workplace Adult Education and Literacy Activities**

As defined in Title II of WIOA, workplace adult education and literacy activities are adult education and literacy activities offered by an eligible provider in collaboration with an employer or employee organization at a workplace or an off-site location that is designed to improve the productivity of the workforce.

Work-based learning is the prime focus of the instruction. Work-based learning is a form of contextualized instruction that builds skills within the context of common work-related situations and real workplace problems or uses actual workplace materials. For example, instruction may incorporate reading an employee handbook or hazardous materials information to improve reading comprehension. Math instruction may involve calculations related to inventory control practices or laying carpet.

### **403.1.4 Integrated Education and Training (federal funds only)**

As defined by Title II of WIOA, integrated education and training 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. This is the only instructional model that can include occupational training, which is otherwise unallowable with division funds.

An integrated education and training program must meet all of the following criteria to be allowable under Title II:

1. It must include all three components: adult basic education, workforce preparation activities, and occupational training;
2. All three components must occur simultaneously, be of sufficient intensity and quality, be research based, and use occupationally relevant instructional materials;
3. The program must have a single set of learning objectives that identifies specific adult education content, workforce preparation activities, and workforce training competencies, and the program activities must be organized to function cooperatively;
4. The integrated education and training program must be part of a career pathway and help an individual enter or advance in an occupation or occupational cluster;
5. The adult basic education instruction must be aligned with the CCRS, provide skills that are transferable to other contexts and situations, and prepare participants to succeed in any employment and/or postsecondary education opportunities; and
6. The occupational training component of the program must align with the skill needs of business in the area and existing, high-quality employment opportunities for participants.



The division requires programs to use the *Integrated Education and Training Checklist* when developing a program. The checklist and the *Integrated Education and Training Proposal* must be submitted to the division for approval. The program must be approved by the division prior to the start of class. A qualified trainer must provide the training portion of the integrated education and training activity.

### 403.2 Open Entry/Open Exit

Programs may provide classes that allow students to enroll and exit based on their needs. Programs are responsible for providing students with a sequence of contextualized lessons that progress through increasing skill levels. Programs need to ensure that students receive orientation and are properly assessed before starting class. Students must adhere to the program's attendance policy. The use of classroom aides can be beneficial to an open entry/exit class.

### 403.3 Supplemental Instruction

Programs with an Adult Basic Education Direct Service 064 grant must provide supplemental distance learning opportunities to students participating in real-time in-person or remote instruction per division policy (Reference [Policy D.130](#)). Programs may also offer supplemental classes in specific content areas to provide additional instruction to students attending regular managed enrollment or open entry/open exit classes who want more intensive instruction. Supplemental instruction cannot be offered in lieu of regular classes.

### 403.4 Tutoring

The Division of Adult Education supports stand-alone service to students with barriers to classroom participation through the use of trained and supported volunteer tutors. Instruction may be one-on-one or in small groups of two to six students. Tutoring instruction must be a sequence of contextualized lessons that progress through increasing skill levels.

## 500 Professional Development and Program Improvement

### 500.1 Purpose

The purpose of continuous program improvement and professional development is to ensure the highest-quality service to the adults who participate in division-funded programs in Pennsylvania. Program improvement efforts will focus on improving program operations and services to learners; professional development planning will focus on improving staff skills and knowledge based on identified learner needs. While not identical, program improvement and professional development efforts should be complementary. (Reference [Policy F.100](#))

Programs providing services under division funding will:

1. Work closely with the professional development system (PDS) through their PDS consultant;
2. Maintain a program professional development team which consists of the program administrator and the in-house professional development specialist;
3. Maintain a program improvement team, with program-wide representation, that guides the program improvement process; the program improvement team must include the program administrator and the in-house professional development specialist. The program

improvement team should include members who will be directly involved in the current year's program improvement and should meet at least quarterly to review progress on program improvement;

4. Provide opportunities for instructors to participate in professional learning communities with a focus on implementing stands-based instruction;
5. Work with the program's PDS consultant to create and maintain the *Program Improvement and Professional Development Worksheet*. This worksheet will incorporate both program improvement and professional development. Programs may have multiple program improvement goals; however, all programs must have at least one program improvement goal that focuses on services to students. The program should use quantitative and qualitative data to determine goals and activities;
6. Submit a *Program Improvement and Professional Development Worksheet(s)* to the PDS consultant;
7. Ensure that all staff, paid and unpaid, are participating in professional development and that the *Program Improvement and Professional Development Worksheet(s)* reflects that participation; and
8. Create the organizational culture (e.g., openness to change, collegial support, provision of time and resources) necessary to support professional development and continuous learning as a means of program improvement.

## 500.2 Professional Development System

Support for professional development and program improvement is provided through the Division of Adult Education's professional development system.

Professional development system staff work directly with program staff. They work with administrators as instructional leaders and with in-house professional development specialists as support for professional development planning. They can also work with agency professional learning communities or individual staff as requested.

## 500.3 Pennsylvania Adult Education and Family Literacy Indicators of Program Quality

The *Pennsylvania Adult Education and Family Literacy Indicators of Program Quality (IPQ)* provide guidance for continuous program improvement and professional development. These indicators apply to all adult education and family literacy programs in Pennsylvania. While there is no expectation that every program will demonstrate every indicator, every indicator area should be discussed in each program, and the indicators should be used as a tool to prioritize and guide continuous program improvement and professional development.

The IPQs are organized into four areas:

1. Program Operations;
2. Instructional Systems;
3. Community Partnerships; and
4. Learner Outcomes.



## 501 Staff Responsibilities for Program Improvement and Professional Development

### 501.1 Program Administrators

Program Administrators as instructional leaders will:

1. Oversee the program improvement team;
2. Participate with the in-house professional development specialist to create and maintain the program improvement/professional development worksheet;
3. Work with in-house professional development specialist to guide and document staff professional development;
4. Provide instructional leadership to instructors;
5. Work closely with the PDS consultant to support these efforts;
6. Keep current with best practices;
7. Be knowledgeable about adult learning theory;
8. Ensure that program improvement supports quality instruction;
9. Ensure coverage for classes while instructors attend training;
10. Ensure the organizational structure and support needed for staff to participate in and benefit from long-term, job-embedded professional development;
11. Provide instructors with access to their data to help inform instruction;
12. Approve staff to attend position-appropriate trainings and ensure that they complete those trainings; and
13. Ensure that instructional staff has adequate, paid preparation and professional development time (Refer to Section 402.1).

### 501.2 In-House Professional Development Specialist

In-house professional development specialists will:

1. Participate with program administrator to create and maintain the program improvement/professional development worksheet;
2. Be an active member in the program improvement team;
3. Provide instructional leadership to instructors;
4. Work with program administrator to guide and document staff professional development in support of the program improvement/professional development worksheet;
5. Support staff to address individual professional development goals;
6. Coordinate and guide the job-embedded professional development process for staff;
7. Assist in the implementation of a variety of formats of professional development (e.g. study circles, coaching, online courses, lesson studies) that support the core features of high-quality job-embedded professional development;
8. Organize agency professional learning communities. IHPDS participation in the professional learning communities is not required;
9. Serve as the main contact between the program improvement team and the program's professional development team;
10. Assist the staff in the use the [PD Portal](#); and
11. Document the impact of professional development activities on program improvement using the *Program Improvement/Professional Development Worksheet*, program improvement team minutes, and data collection tools.

### 501.3 Tutor Coordinator

Tutor coordinators will:

1. Assist classroom aides and tutors to identify individual professional development needs;
2. Support classroom aides and tutors to develop knowledge and skills identified; and
3. Document professional development for classroom aides and tutors.

### 501.4 Instructional Staff

Instructional staff will:

1. Work with the in-house professional development specialist (or tutor coordinator for tutors) to plan for professional development based on identified needs with the goal of improving quality instruction;
2. Participate in professional development activities in support of their individual professional development; and
3. Participate in program improvement efforts. This may include:
  - a. Participation in the program improvement team;
  - b. Participation in the program's professional learning communities;
  - c. Identifying program improvement goals;
  - d. Reviewing data related to program improvement goals;
  - e. Providing feedback on impact of program improvement efforts; and/or
  - f. Implementing program changes.

### 501.5 Non-instructional Staff

Non-instructional staff will:

1. Work with the in-house professional development specialist to plan for professional development based on identified needs with the goal of improving services to students;
2. Participate in position-appropriate professional development activities in support of their individual professional development (e.g., student support coordinators take student support courses); and
3. Participate in program improvement efforts. This may include:
  - a. Participation in the program improvement team;
  - b. Identifying program improvement goals;
  - c. Reviewing data related to program improvement goals;
  - d. Providing feedback on impact of program improvement efforts; and
  - e. Implementing program changes.

## 502 Required Professional Development

The Division of Adult Education has established the following professional development requirements for staff in division-funded programs:

1. All staff who will enter data into the eData system must complete the Introduction to eData course prior to entering any data into eData.

2. All staff who administer assessments, including family literacy assessments, must take the appropriate initial assessment course and complete refresher courses at the prescribed intervals as outlined in Policy D.100.
3. All staff who participate in intake or orientation must complete the staff induction Intake/Orientation module.
4. All staff are required to annually review National Reporting System (NRS) cohort criteria and data matching requirements.
5. Staff new to the field of adult basic education or family literacy must complete appropriate professional development within their first year of employment.
  - a. All new staff must complete a minimum of three staff induction modules. Program administrators will decide which modules are most applicable for their staff.
  - b. All new staff must complete a field observation of an experienced staff person doing similar work.
  - c. New staff who work half time or more must also take a job-specific introductory course.
    - i. New administrators must take New Administrator Training.
    - ii. New instructors must take one of the following courses chosen based on the main focus of their instruction: ESL Basics, Family Literacy Foundations, CCRS Foundations – ELA Lesson Planning, or CCRS Foundations – Math Lesson Planning.
    - iii. New student support specialists must take Student Support Basics.
    - iv. New data quality specialists must take the Introduction to eData course.
    - v. New tutor coordinators must take Tutor Coordinator Basics.

The Division of Adult Education may also require programs to participate in statewide professional development initiatives designed for program improvement.

## 600 Fiscal Requirements

Grant funds for adult education and family literacy programs in Pennsylvania must be managed in accordance with sound financial management policies and practices and in conformity with all state and federal financial rules and regulations.

Applicable state and federal administrative requirements, cost principles, and audit requirements are incorporated into each grant award by reference. They include, but are not limited to:

1. [Education Department General Administrative Regulations \(EDGAR\) 34 Code of Federal Regulation \(CFR\) Parts 75, 76, 77, 79, 81, 82, 84, 86, 97, 98, and 99 as amended on December 19, 2014](#)
2. [Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards \(Uniform Guidance\)](#)
3. [PDE Master Standard Terms and Conditions](#)

## 601 Program Year

The program year is defined as July 1 through June 30.

## 602 Funding Equity

PDE uses a needs-based funding formula to provide equitable distribution of funds to local workforce development areas. The formula includes six data sets weighted equally: the number of individuals age 18 and over who are not enrolled in school and who do not have a high school diploma; the number of individuals age 16 and over who are in the labor force and are unemployed; the number of individuals age 18 and over with less than a ninth grade education; the number of people below poverty level; the number of on-the-job training openings per year; and the square mileage of the local workforce area. PDE further breaks out funding by county to ensure services are available throughout the local workforce area.

### 602.1 Allocation of Funds to Counties Served

Based on the competition for Adult Basic Education Direct Service (064) grants, programs were awarded specific funding amounts for each county in which services were proposed. All programs must continue to provide services in all of the counties for which they were awarded funds and must allocate the same amount of funds to each county as awarded in the competition. Any change to the distribution of funds across counties must be approved by the division.

## 603 Financial Management System

Programs must use funds for the intended purposes and must maintain a financial management system with written policies and procedures (including all of those required by *Uniform Guidance*) that provides for accurate, current, and complete disclosure of the financial results of each grant project. The financial management system records must adequately identify the source and application of funds and must contain information pertaining to grant awards, authorizations, obligations, unobligated balances, assets, expenditures, income, and interest. The system must employ standard accounting practices, sufficient internal controls/segregation of duties, a clear audit trail, and written cost allocation procedures as necessary.

Grant recipients must maintain adequate supporting documents for expenditures (federal and nonfederal) and in-kind contributions under the grant. Costs must be shown in reports and must be supported by a source document, such as a receipt, travel voucher, invoice, bill, in-kind voucher, or similar document.

The financial management system must be capable of distinguishing expenditures attributable to each grant from expenditures not attributable to the grant. The system must be able to identify costs by programmatic year and by budget category and to differentiate between direct and indirect costs or administrative costs. For purposes of federal reporting requirements specific to Title II of WIOA, the financial management system must be capable of accurately reporting expenditures for PA CareerLink® infrastructure costs and career services allowable under Title II of WIOA. The system must also be capable of determining actual expenditures on services by activity.

### 603.1 Use of Funds - General Principles

Funds requested must be used only for those items that are reasonable and necessary for accomplishing the objectives of the program and for implementing activities as described in the

application. All items requested must be allowable expenditures under the authorizing program statutes, regulations, and rules and must be appropriately allocated. The information in the following sections provides a summary of the General Principles. Refer to the *Uniform Guidance* for specific requirements.

### **603.1.1 Factors Affecting Allowability of Costs**

Under Uniform Guidance §200.403, costs must meet the following criteria to be allowable:

1. Be reasonable for the performance of the grant and be allocable under the applicable cost principles;
2. Conform to limitations or exclusions set forth in applicable cost principles or the grant agreement as to types or amount of costs;
3. Be consistent with policies and procedures that apply uniformly to federally-funded activities and activities funded from other sources;
4. Be accorded consistent treatment among all grant programs, regardless of funding source;
5. Be determined in accordance with generally accepted accounting principles (GAAP);
6. If federal, not be included as cost or used to meet cost-sharing or matching requirements of any other federally-funded program in the current or a prior period; and
7. Be documented.

### **603.1.2 Reasonable and Necessary**

Reasonable costs are consistent with prudent business practice and comparable to current market value. Necessary costs are essential to accomplish the objectives of the program. (Refer to the *Uniform Guidance*, §200.404)

### **603.1.3 Allocable Costs**

A cost is allocable to a particular grant in accordance with the relative benefits received, if it is treated consistently with other costs incurred for the same purposes in like circumstances. (Refer to the *Uniform Guidance*, §200.405)

## **603.2 Program Income**

Program income is defined in *Uniform Guidance* §200.80 as “income earned by the non-Federal entity that is directly generated by a supported activity or earned as a result of the Federal award during the period of performance.” PDE does not allow programs to generate program income from Division of Adult Education grants. Grantees may not impose any fees or other charges on students for participation in grant-funded programs. Grantees may not sell textbooks or other supplies to students.

## **604 Use of Funds - Specific Considerations**

### **604.1 Expenditures**

Eligible expenditures for actual program expenses may include wages, salaries, and fringe benefits; books, materials, and supplies; clerical services; rental of facilities that are not owned by the sponsoring program; rental of equipment not owned by the sponsoring program; training of volunteers and tutors; student support services; outreach and recruitment activities;

membership dues for participation in organizations specifically focused on adult education; financing the costs of online services; and administrative costs.

**Note:** Unexpended grant funds carried over to the fourth quarter of the program year should not be used to purchase supplies or instructional materials for the next program year.

## 604.2 Limitations

### 604.2.1 Statutory Floors and Ceilings

Federal: Under the Title II, WIOA, Sec. 233, the following local administrative cost limit is in effect:

1. No more than 5 percent of a grant to a local provider may be used for administrative costs. See [Section 607.6.1](#) for exception.

State: Under State Act 143, the following local program level limits are in effect:

1. No more than 10 percent of any grant may be used for support services necessary to enable individuals to participate in the program ([Function Code 2160](#));
2. No more than 10 percent of the grant may be used for administrative costs incurred by the adult or family literacy provider ([Function Code 2300](#)).

### 604.2.2 Division-Imposed Floors and Ceilings

Federal direct service grants (federal 064 and 061): The Division of Adult Education requires that:

1. 25 percent of program costs be provided by local match; and
2. No more than 20 percent of any grant be used to provide education to institutionalized adults, unless preapproved by the division.

State grants (state 064): The Division of Adult Education requires that:

1. A minimum of 5 percent of state 064 grant funds be used to recruit, train, and support a cadre of volunteer classroom aides. This does not apply to state-funded family literacy grants. (Reference [Appendix AA3](#) and [AA3.1](#))
2. No more than 20 percent of any state 064 grant be used to provide education to institutionalized adults, unless preapproved by the division.
3. No more than 20 percent of any state 064 grant be used for instruction to prepare students at the adult secondary level to take high school equivalency tests.

**Note:** Expenditures in these areas are authorized through the grant review and approval process. Any changes to the approved amounts must be preapproved by the division. Approval is not guaranteed.

### 604.2.3 Budgeting an Employee's Hours in One or More Grants

Programs may budget an employee's hours in one or more grants awarded by the division. Generally, the total number of hours per each employee cannot exceed one full time equivalent (FTE) position, up to a maximum of 2,080 hours per program year. However, grantees that have

a formal written policy allowing employees to be hired for distinct sets of duties under two separate contracts may employ staff members for more than 2,080 hours, as long as no single contract with each employee exceeds 2,080 hours.

Documentation of employees' hours must be available for review by division staff.

#### **604.2.4 Staff Activities**

As part of reporting staff hours on time and effort sheets, programs must also report staff activities by function code and object code. This information assists program administrators in creating future budgets and ensures that program expenditures are not exceeding legislative floors and ceilings.

#### **604.2.5 Creation of Publications (Disclaimer Statement)**

Agencies must ensure that any publication that contains project materials, defined in EDGAR 75.622 as a copyrightable work developed with funds from a grant of the department, also contains the following statements:

“The contents of this (insert type of publication: e.g. book, report, film) were developed under a grant from the U.S. Department of Education. However, those contents do not necessarily represent the policy of the U.S. Department of Education, and you should not assume endorsement by the Federal Government.”

### **604.3 State Act 143 Family Literacy Program**

Staff personnel, equipment, and operating costs used to defray the costs of Parenting and ILA components are considered an eligible use of Act 143 funds if these services are not available locally. These funds may be used for support services such as transportation, child care, counseling, healthcare and nutrition information, and crisis intervention when other sources are not available. Funds may also be used to purchase food or snacks for parent-child interaction activities, if not available locally. Since each locality is different when determining the availability of resources, exceptions will be made for special circumstances. Funds may not be used to supplant existing public and private funds currently used to provide similar services in the community.

## **605 Ineligible Use of Funds**

Expenditures under grants from the Division of Adult Education are subject to the *Uniform Guidance, Subpart E—Cost Principles*. In addition, state Act 143 and federal Title II, WIOA funds may not be used in the following cases: (This list is not comprehensive.)

1. To supplant other existing public or private funds currently used to provide adult basic education and/or family literacy services;
2. As funds that are commingled with other public or private funds, but may be used in conjunction with such funds;
3. To pay high school equivalency testing fees; and
4. To cover the cost of instruction at the postsecondary level. Exception: the division may approve the use of federal grant funds for occupational training within a division-approved integrated education and training program.



## 606 Budget

All items entered into a budget must be entered by Function Code and Object Code. Function Codes describe the activities for which a service or material is acquired. Object Codes describe the object, which is the service or commodity obtained as the result of a specific expenditure. Amounts can either be rounded to the nearest dollar or as an exact amount. Exceptions are noted in the appropriate sections. When completing a grant budget, programs can reference the [Budget Guide](#) for additional assistance.

## 607 Function Codes

Function Codes describe the activities for which a service or material is acquired. For the purpose of preparing budgets for grants received from the Division of Adult Education, the Function Code categories detailed in the *Chart of Accounts* have been redefined, within the parameters of the *Manual of Accounting*, to reflect true costs associated with the operation of an adult education program.

### 607.1 Function Code 1691 – Instructional Services

Expenses associated with instructional services include the support and delivery of instruction, intake and assessment for adults (and children, if family literacy). Allowable expenses include salaries and benefits for instructors, support personnel and for the supervision of the activities. It also includes instructional and classroom materials, equipment, and travel.

### 607.2 Function Code 1692 – Tutor Training

Expenses associated with the program's tutoring component, including all of the expenditures associated with the recruitment, training, and support for volunteer tutors, volunteer classroom aides, and peer tutors (in correctional facilities or other institutions only). Allowable expenses include salaries and benefits for the recruitment, coordination, management, evaluation, and supervision of the tutoring component. It also includes training materials, equipment, and travel for the tutor coordinator.

### 607.3 Function Code 2122 – Counseling Services (Transition Support)

Expenses associated with the support and delivery of activities associated with assisting learners with transitioning into postsecondary education, training, and employment. Allowable expenses include salaries and benefits for transition support activities and for the supervision of the activities. It also includes appropriate materials and travel. If student support coordinators participate in intake and orientation activities, that time may also be allocated to this function code.

### 607.4 Function Code 2160 – Social Work Services (Barrier Support)

Expenses associated with the support and delivery of activities to assist learners with barriers to participation. Allowable expenses include salaries and benefits for assistance activities and for the supervision of the activities. It also includes appropriate materials and travel. Also allowable, if not provided or available through other funding sources (federal, state, or local), are expenses associated with learner transportation and childcare.



**Note:** Refer to section 604.2.1 for information on statutory limits on expenditures for support services necessary to enable individuals to participate in the program.

### **607.5 Function Code 2200 – Staff Support Services (In-House PD Specialist)**

For direct service grants: Expenses associated with the delivery of professional development support for program staff by the In-House Professional Development Specialist. Allowable expenses include salaries and benefits for the In-House Professional Development Specialist and for the supervision of the activities. It also includes appropriate materials and travel.

For state leadership grants: Expenses associated with assessing, supporting, advising and directing instructional staff with or on the content and process of providing learning experiences for learners. Included in this function code are staff development services designed to contribute to the professional growth and competence of program staff, such as traditional professional development activities and consultant services. Allowable expenses include salaries, benefits, materials, travel, rent, and supervision of the leadership staff.

### **607.6 Function Code 2300 – Support Services Administration**

Expenses associated with administration of the grant. Allowable expenses include salaries and benefits for grant writing; attendance at division meetings; PA CareerLink<sup>®</sup> responsibilities, including providing career services to PA CareerLink<sup>®</sup> clients at the PA CareerLink<sup>®</sup> site (in federal 064 and 061 grants); daily administrative duties; performance accountability oversight; personnel recruitment; program strategic planning; appropriate materials; and travel. It also includes PA CareerLink<sup>®</sup> infrastructure costs and shared PA CareerLink<sup>®</sup> personnel costs (in federal 064 and 061 grants), human resources, payroll, accounting, audits and mandatory grantee trainings whether purchased or provided by program personnel. In addition, it includes expenses for purchased professional development activities.

**Note:** Refer to section 604.2.1 for information on statutory limits on administrative expenditures.

#### **607.6.1 Request to Increase Administrative Expenditures on Federal Grants**

Per Title II, WIOA, Sec. 233, not more than 5 percent of a federal 064 or 061 grant amount can be expended on administrative activities as defined above in section 607.6. In cases where 5 percent is too restrictive to allow for administrative activities, the division may increase the amount that can be spent on local administration. In such cases, the local program must negotiate with the division to determine an adequate level of funds to be used for non-instructional purposes. Refer to Appendix E of these guidelines for more information on administrative expenditures in federal grants.

The 10 percent cap on administrative costs in state 064 and 054 grants is firm. Local programs cannot negotiate an amount greater than 10 percent.

### **607.7 Function Code 2600 – Operation and Maintenance**

Expenses associated with keeping the physical plant open, comfortable, and safe for use. Allowable expenses include salary and benefits for the building custodian, utilities, insurance, rent, and building equipment. A cost allocation system must be used for expenditures. In state

064 and 054 grants, any PA CareerLink® infrastructure costs or shared PA CareerLink® personnel costs should be charged to this function code, using separate entries for those two categories.

## **607.8 Function Code 2900 – Other Support Services (Student Recruitment and Data Entry)**

Expenses associated with learner recruitment and data entry for the grant. Allowable expenses include salaries and benefits for personnel and for the supervision of the activities. It also includes appropriate materials and travel.

## **608 Object Codes**

Object Codes are used to describe the object, which is the service or commodity obtained as the result of a specific expenditure. For the purpose of the preparing budgets for grants received from the Division of Adult Education, the object code categories detailed in the *Chart of Accounts* have been redefined, within the parameters of the *Manual of Accounting*, to reflect true costs associated with the operation of an adult education program. All object costs must be placed in the appropriate function code from which the benefit is derived.

### **608.1 Object Code 100 Series – Salaries**

Gross salaries paid to individuals to support and deliver activities in the grant, including travel time between sites, preparatory time and professional development activities. All salary costs must be pro-rated and charged across all appropriate function codes and object codes.

1. Object Code 101 - Supervisors/Coordinators  
Salaries paid to adult education or family literacy professionals who directly oversee all or a portion of the program.
2. Object Code 102 - Instructors (Adult Education)  
Salaries paid to individuals instructing a class or small group.
3. Object Code 103 - Counselors  
Salaries paid to individuals providing student support activities which include barrier support and transition support services.
4. Object Code 104 - Tutor Trainers  
Salaries paid to individuals who support the tutoring component of the program.
5. Object Code 105 - Admin Support Personnel  
Salaries paid to individuals who provide administrative support for the activities of the program.
6. Object Code 106 - Adult Education/Other (local match for federal budget only)  
The value of the time volunteer tutors spend planning for or instructing small groups, tutoring one-on-one, or serving as classroom aides.
7. Object Code 107 - Early Childhood Educators (family literacy grant only)

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Salaries paid to individuals instructing an early childhood class. Instruction must meet the requirements of reportable early childhood hours. Do not use this code for babysitting/childcare activities.

8. Object Code 108 - Parenting Educators (family literacy grant only)  
Salaries paid to individuals instructing parenting class.
9. Object Code 109 - PACT/ILA instructors (family literacy grant only)  
Salaries paid to individuals instructing ILA.
10. Object Code 110 - Official/Administrative  
Salaries and benefits paid to individuals supporting the grant. Allowable expenses include activities performed by the grantee staff associated with human resources, fiscal/accounting, etc.
11. Object Code 116 - Employee Insurance Opt Out  
Payments made to an employee opting out of inclusion in an insurance plan. These include payments to a health savings plan in lieu of cash payment.
12. Object Code 190 - Instructional Assistant  
Salaries and benefits for babysitting/childcare services in function code 2160.

### 608.2 Object Code 200 Series – Benefits

Fringe benefits paid for individuals working in the grant. Benefit costs must be pro-rated and charged across all appropriate function codes in a manner consistent with salaries.

1. Object Code 210 - Group Insurance (Medical, Dental, Vision, etc. contracted provider)  
The employer's share of group insurance (life, medical, dental, eye, and prescription) for employees in the grant.
2. Object Code 220 – FICA (Social Security Contributions)  
The employer's share of Social Security and Medicare taxes paid to the IRS for employees in the grant.

**Note:** For state 064 and 054 grants, LEAs (School Districts, Intermediate Units, Career and Technical Schools, Charter Schools, Community Colleges) that have one-half of their Social Security payments already funded by state subsidies shall use one-half of the current or projected FICA rate as the FICA rate, at the time of publication of these guidelines, for computation of fringe benefits.

3. Object Code 230 - Retirement  
The employer's share of retirement contribution paid to the retirement fund.
4. Object Code 231 – Other Benefits  
The employer's share of other benefits not covered in the other 200 series.
5. Object Code 250 - Unemployment Compensation  
The employer's share of unemployment compensation purchased from the Pennsylvania Department of Labor and Industry.

6. Object Code 260 – Workers' Compensation  
The employer's share of Worker's Compensation insurance coverage.

### **608.3 Object Code 300 Series – Purchased Professional and Technical Services**

Costs incurred for contracted services outside of the grantee program that require specialized skill and knowledge. These may include auditors, lawyers, consultants, instructors, case managers, accountants, etc.

A breakdown of contracted services must be completed under "Contracted Services" in eGrants.

1. Object Code 320 - Professional Educational Services  
Expenditures for contracted education services not provided by program personnel. This includes all subcontracting expenses for educational services. This also includes instruction, tutor training, student support services, administrative support, data entry, in-house professional development specialist and student recruitment if not performed by program personnel. The recipient of grant funds may not act as a fiscal agent only and subcontract the entire program funded through the state and federal grants. The costs of occupational training in the context of a division-approved integrated education and training program paid for with grant funds must be allocated to this object code. Programs must contract with a qualified trainer for the occupational training portion of an integrated education and training program.
2. Object Code 330 - Other Professional Services  
Purchased Professional Services other than educational in support of the grantee program's operations including lawyers, auditors, accountants, fiscal management services, and legal services. Expenses related to background checks must be allocated to FC 2300. In federal 064 and 061 grants, shared PA CareerLink® personnel costs must be entered in this object code.
3. Object Code 340 - Technical Services  
Costs associated with purchased technical services which include technology (computer services, system design and development, software development, and backup facilities).
4. Object Code 350 - Security/Safety Services  
Costs associated with security personnel not employed by the agency or program.
5. Object Code 360 – Employee Training and Development Services  
Expenditures for professional development for program personnel. This includes course registration fees, paid trainers, and other expenditures associated with training provided by third party vendors.
6. Object Code 390 – Other Purchased Professional and Technical Services  
All PA CareerLink® infrastructure costs included in an MOU with the local workforce board. This includes all PA CareerLink® infrastructure costs paid by subgrantees to the local board under the MOU. Use FC 2300 in federal 064 and 061 grants. Use FC 2600 in state 064 and 054 grants. In state 064 and 054 grants, enter shared PA CareerLink® personnel costs in this object code as a separate entry from infrastructure costs.

## 608.4 Object Code 400 Series – Purchased Property Services

Costs associated with purchased property services not included in a rental agreement and not performed by program employees.

1. Object Code 410 - Cleaning  
Expenditures for property services by an outside vendor. Allowable expenses include disposal, snow plowing, custodial, and lawn care services not performed by grantee personnel.
2. Object Code 420 - Utilities  
Expenditures associated with utilities which include electric, gas, water, sewer, etc. Communication costs are unallowable in this object code.
3. Object Code 430 - Repairs and Maintenance Services  
Expenditures associated with repairs and maintenance services to the building and equipment that are purchased rather than provided by the grantee program staff. This includes reoccurring maintenance contracts, one-time maintenance costs, part repair costs, laptop batteries, video cards, hard drives, memory chips, and power supplies with a useful life of one year or less.
4. Object Code 441 – Space Rental  
Expenditures associated with space rental agreements for classrooms and offices from an independent third party (not an entity who is the lead applicant or partner in the grant). The rental costs must be comparable to other tenants (including custodial services, if applicable). Current rental agreements must be maintained and available for review at the site.

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| <p><b>Note:</b> Grant funds may not be used to pay for the rental of any property owned by the grantee or anyone affiliated with the grantee. However, the value of such space may be reported as part of the required 25 percent local match. The amount reported as local match must be determined in compliance with the <i>Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards</i>.</p> |
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5. Object Code 442 - Equipment Rental  
Expenditures associated with rental agreements for equipment for temporary or long-term use from an independent third party that support program activities. Rental agreements from a lead applicant or partner in the grant are unallowable.
6. Object Code 448 - Lease/Rental of Hardware and Related Technology Services  
Expenditures include the lease/rental costs incurred for computers and other technology. DO NOT include maintenance on these items in this category. Maintenance costs on these items should be recorded to object 430.
7. Object Code 449 – Equipment Usage  
Expenditures for equipment charged on a per use basis (100 percent Usage Log Maintained).
8. Object Code 490 - Other Purchased Property Services  
Expenditures for property services not provided by grantee personnel and unallowable elsewhere in purchased property services.

## 608.5 Object Code 500 Series – Other Purchased Services

Expenditures for services not provided by grantee program staff. Allowable expenditures for purchased services outside of the organization and unallowable under Professional and Technical Services and Purchased Property Services.

1. Object Code 520 – Insurance (General)  
Expenditures for fire, property, and liability insurance.
2. Object Code 530 – Communications  
Expenditures for telephone, Internet service, postage, and postage machine rental.
3. Object Code 540 - Advertising  
Expenditures related to advertising for the program. Allowable expenses include ads in newspapers, periodicals, radio, and television for student outreach and personnel recruitment. Expenses for grantee program advertising or public relations are unallowable.
4. Object Code 550 - Printing and Binding  
Expenditures for printing and binding of forms, brochures, pamphlets, and posters not performed by grantee program personnel.
5. Object Code 580 - Travel  
Expenditures for employee transportation related to division required attendance at meetings, travel to and from professional development activities, travel to and from main office to class sites, and associated travel expenses including conferences incurred by program staff on behalf on the program.

Note: Travel rates will be at or below commonwealth rates in effect at the time of the application. Reimbursement for travel, lodging, and/or meals at a rate higher than current commonwealth rates may be allowed by PDE if these rates were approved by the agency's officials and were published prior to the date of the application submission. If higher rates are requested, a copy of the minutes or other official documentation demonstrating that the agency's officials have approved a higher rate must be attached to the budget. Commonwealth travel rates are specified in the Commonwealth Travel Procedures Manual 230.1.

## 608.6 Object Code 600 Series – Supplies

Expenditures for consumable items that do not need to be inventoried.

1. Object Code 610 - Office Supplies  
Expenditures for all supplies that do not need to be inventoried. These include items that are consumed, worn out, or deteriorate in use. Includes paper-based assessments and family literacy supplies. Costs associated with personal protective equipment (PPE) and additional related cleaning supplies should be allocated to FC 2600. Enter PPE costs as a separate entry labeled as COVID supplies.
2. Object Code 640 - Texts (Books and Periodicals)  
Expenditures for text and reference books for classroom use or tutoring.

3. Object Code 650 - Supplies and Fees (Technology Related)  
Expenditures for technology related supplies and fees including educational software, flash drives, and software licensing fees.

### **608.7 Object Code 700 Series – Property**

Expenditures for the acquisition of fixed/capital assets, initial equipment; additional equipment and replacement of equipment.

A breakdown of property purchases must be completed under “Equipment” in eGrants.

1. Object Code 790 - Equipment

Expenditures for the purchase of equipment having a useful life that extends beyond the current fiscal period and that require inventory management. These may include computers, audio/video equipment, projectors and telephone systems. A breakdown of property purchases must be completed under “equipment” in eGrants. PDE approval is mandatory for any equipment purchase not included in the approved budget.

Grantees must comply with the *Uniform Guidance* in the purchase, use, and accountability of the equipment when purchased with federal funds. Grantees must maintain annual inventories and usage logs for duplication charges against the grant, and additional reports when requested by PDE.

### **608.8 Object Code 800 Series – Dues and Fees**

Amounts paid for expenditures not otherwise classified in object codes 100 through 700.

1. Object Code 810 – Dues and Fees  
Costs of membership in professional organizations and conference registration fees for job-related conferences.
2. Object Code 891 – Other Miscellaneous Expenditures  
The program may use the unused portion of its approved restricted indirect cost rate (RICR) as local match. The program cannot use more than its approved RICR as local match.

### **608.9 Object Code 900 – Indirect Costs**

Indirect costs are overhead expenditures/expenses incurred by one program or activity for the benefit of other programs or activities such as payroll preparation, accounting, publishing, etc. Because adult education funds under Title II of WIOA “shall supplement and not supplant” other state and local funds, indirect costs may only be charged using an approved RICR. PDE calculates annual RICRs for LEAs. Since applications are submitted prior to the computation and publication of a new RICR, the grantee will use the rate in effect on the date the application is submitted. If adjustments are necessary, the grantee will make them in the final expenditure report PDE-5040. Unrecovered indirect costs may not be counted as part of local match.

Non-LEAs, including community-based organizations, universities, and colleges, may compute indirect costs at a RICR of 8 percent.



Indirect costs may be recovered only to the extent that direct costs against the grant were incurred. Thus, when the final expenditure report PDE-5040, is submitted, the indirect costs must be recalculated based on actual expenditures from the grant. In addition, equipment purchases and subgrant amounts greater than \$25,000 per subgrant must be deducted from direct costs prior to calculating indirect costs. Indirect costs may only be charged to Function Code 5000/Object Code 900, or listed as part of the local match for federal 064 or 061 grants. Unrecovered indirect costs may not be counted as part of local match.

Indirect costs are subject to the statutory limitations on administrative expenditures in WIOA and Act 143 (see section 604.2.1). Any indirect costs charged to the grants must be added to the total direct administrative costs in Function Code 2300 to determine total administrative expenditures subject to the statutory limitations.

## 609 Local Matching Funds

The division requires a 25 percent local match for direct service grants under federal WIOA section 231 funding (064 federal) and section 243 IELCE (061), which is reported to the federal government as part of the match required of the state in AEFLA Sec. 222 (b). Local match is the portion of a grant-supported project or program not borne by the federal government. To calculate the amount of the local match for a known grant amount, divide the grant amount by three. For example, the grant amount is \$75,000;  $75,000 / 3 = 25,000$ . So, a \$75,000 grant requires a local match of \$25,000 which results in a total overall program cost of \$100,000. Thus, the \$25,000 in local match is 25 percent of the cost to run the program.

All non-federal contributions, including cash and third party in-kind, that support activities provided under either federal or state funds are accepted as part of the local match, also referred to as cost sharing, provided they meet the requirements identified in § 200.306 of the *Uniform Guidance*. These requirements include, but are not limited to, the following:

1. They must be allowable costs under applicable cost principles. This requirement includes third-party in-kind donations. If the cost of an expense is unallowable (e.g., payment of high school equivalency testing fees), the value of donations to cover that expense CANNOT be used as local match.
2. They must be documented and verifiable from your records. These records must show how the value placed on third party in-kind contributions was derived. The value of donated items (supplies, equipment, space, etc.) cannot exceed fair market value.
3. They must be necessary and reasonable for proper and efficient accomplishment of the purpose of the grant. The value of third party in-kind contributions must be applicable to the program year.
4. They cannot be included as local match for any other federally-assisted project or program nor can they be paid for by another federally-funded award.
5. Indirect costs that are unrecovered as a result of the use of the restricted indirect cost rate (refer to 608.9) may not be used as local match.

Agencies will report local match in both the grant budgets and in the final expenditure reports. To support federal financial reporting requirements, agencies will report local match in two categories: cash and third-party in-kind contributions. Uniform Guidance § 200.96 defines third-party in-kind contributions as “the value of non-cash contributions (i.e., property or services) that (a) benefit a federally assisted project or program; and (b) are contributed by non-Federal third parties, without charge, to a non-Federal entity under a Federal award.” Costs in support of the



adult basic education program that are paid by the grantee agency with local funds will be reported as cash.

## 610 Budget Reallocations

Grantees are permitted the flexibility to reallocate most costs within a budget provided that the resultant costs are within the approved grant. These reallocations may be between Object Codes and Function Codes to meet unanticipated expenses. The following restrictions apply:

1. The original approved total budget amount must remain unchanged.
2. State Act 143 funds:
  - a. The 10 percent caps on Function Codes 2160 and 2300 must not be exceeded.
  - b. Tutor training amount cannot be reduced without prior waiver approval by the division.
  - c. Amount expended for high school equivalency test preparation and institutional instruction cannot be increased without prior written approval from the division.
3. Federal WIOA, Title II funds:
  - a. The amount expended for institutional instruction cannot be increased without prior written approval from the division.
  - b. If the reallocation of funds will cause the total in the Function Code 2300 Administrative Services to exceed 5 percent or the previously approved waiver amount, a waiver request must be submitted and written approval received from the division. (See section 607.6.1).

### 610.1 Budget Revisions

Grantees that move greater than 10 percent of the approved budget amount among Object Codes and Function Codes are required to submit a budget revision. Requests for budget revisions must be submitted to the advisor and approved prior to implementation. The request should include an explanation and justification of the budget revision. Programs will be notified by email of the approval or disapproval of the requested budget revision. Grantees requiring adjustments to budgets must have approval prior to submitting a budget revision in the eGrants system. See Section 700 for due date for budget revisions.

## 611 Encumbrance of Funds

Funds are allotted according to a fiscal year that begins July 1 and ends June 30. The period available for encumbrance/obligation of funds is indicated on the Grant Agreement and normally coincides with the fiscal year unless a different period has been negotiated with and approved by PDE.

**Funds not encumbered by the local program by the last day of the contract period will be withdrawn.** An obligation of funds will be considered to have been incurred if a recipient has documentary evidence of binding commitments for the acquisition of goods or materials for the performance of work. However, funds for personal services or for the rental of equipment and facilities shall be considered to have been obligated as of the time such services were rendered or such rental equipment and facilities were used.

## 612 Payment Schedule

The payment schedule is reflected in the Payment Terms, Responsibilities, and Contact Information, Appendix C of the Grant Agreement.

Once the annual grant information is through the review and approval process, PDE will make monthly payments for the duration of the period covered by the Agreement based on quarterly reports and cash needs. The Reconciliation of Cash on Hand Quarterly Report (PDE 2030) will be submitted through the FAI system by the tenth business day of October, January, and April. If the grantee anticipates extraordinary cash needs in excess of regularly scheduled monthly payments, complete Part III of the report. Questions regarding the payment schedule or the FAI system can be addressed to the resource account at [ra-faiecs@pa.gov](mailto:ra-faiecs@pa.gov). Any Reconciliation of Cash on Hand Quarterly Report received after the due date will result in suspension of monthly contract payments until the report is submitted to the comptroller.

**Note:** *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* requires PDE to conduct an annual risk analysis of all grantees. Based on the results of the risk analysis, PDE may impose specific conditions on individual grantees, including an alternative payment schedule.

## 613 Fiscal Reports

### 613.1 PDE 2030 - Reconciliation of Cash on Hand Quarterly Report

The Reconciliation of Cash on Hand Quarterly Report is used to adjust monthly payments of grant funds. The report is submitted electronically via the Financial Accounting Information version 2 (FAI v2) System through the [PDE website](#). For assistance using the FAI system, send an email to the FAI resource account at [ra-faiecs@pa.gov](mailto:ra-faiecs@pa.gov).

The Reconciliation of Cash on Hand report must be submitted for each program (054, 061, 064, and 099). Only one report is required for the 064 program. The Reconciliation of Cash on Hand report for the 064 grants should include federal and state monies combined.

**Note:** Do not contact the advisors. They do not have access to the FAI system.

#### Instructions for Completing the Report

1. Access the site via [PDE website](#) and click on, "MyPDESuite."
2. Click on "Visit the MyPDESuite logon page", and log in using your username and password as assigned.  
If you are not registered for FAI, click on the link "Register for an Application." Select FAI from the dropdown menu and click "Search." You can then register for roles such as Web user, Web ECS QRDraft or Web ECS QRSubmit. If you have any problem registering for roles, contact your Local Security Administrator. To find the name of your Local Security Administrator, go to the FAI Homepage and click on the link, "Find My Security Administrator."
3. Once logged in, you will see at the bottom, "My PDE Applications." Select FAI and click "GO."

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4. You will be directed to the FAI page where four options are available. Select “Project Status.” This will tell you the status of your grants and when your quarterly reports are due. (**Note:** If a program has not received any funds within a quarter, a quarterly report is not necessary.)
5. To complete your Reconciliation Cash on Hand Quarterly Report, click on “Quarterly Report Due.”
6. A page will appear with four parts.
  - a. Part 1 includes your organization’s name, the quarter for this report, the program (project number, approved project amount and month payment amount). These fields are automatically filled in for you.
  - b. Part 2 is the section of the report where you report the cash that you have dispersed.
    - Line 1 is the total cash received for this grant. This will be filled in automatically.
    - Line 2 is the amount you have spent. You will see \$0.00. You must complete the cumulative amount of cash dispersed from the grant. After entering the amount in this field, press the TAB key to allow the calculation to update.
    - Line 3 is an auto calculated field. This is the amount that is available after calculation of Line 1 minus Line 2. If you spent the full amount, your cash on hand will show \$0.00.
    - Line 4 is an auto populated field. This shows your Scheduled Monthly Payment amount.
    - Line 5 is an auto calculated field. This is the amount remaining on the project; Line 3 plus Line 4 (Cash on Hand plus Scheduled Monthly Payment).
    - Line 6 is the Estimated Cash Requirement for the next month which could be greater than, less than, or equal to your Scheduled Monthly Payment.
    - Line 7 is an auto calculated field. This is the amount that you have available, Line 5 minus Line 6 (Cash Available minus Estimated Cash Requirement) for next month.
  - c. Part 3 is the section where you can explain if your program has extraordinary cash needs. Click “yes” or “no” and if “yes”, explain in area to right. (If line 7 is a negative amount, you will not be able to complete this section.)
  - d. Part 4 will be filled in with the contact person (person who is responsible for completing quarterly report), area code, and telephone number. Date will fill in automatically. Click both boxes to right prior to hitting “Submit Complete.”
    - At this point you can save the draft report to complete or review later prior to submission, submit the completed report, or reset the form to clear all entries.
    - If you are having trouble submitting this report, please contact your Local Security Administrator who can assign the appropriate roles to you.
    - If you submit the report with incorrect information, and the report is not imported by Comptroller’s Operations, click on “Reset Form.” Enter the correct information and resubmit the report.
  - e. To print a copy of the submitted report, return to the FAI home page. Select “project status,” then “project code.” Select “previously submitted quarterly reports” and “print.”

**Note:** Any Reconciliation of Cash on Hand Quarterly Report received after the due date will result in suspension of monthly contract payments for at least one month until the report is processed by the Comptroller.

## 613.2 Division of Adult Education Quarterly Reports

The Division of Adult Education Quarterly Reports are used by the division to monitor expenditures to ensure that programs are on track to meet any legislated floors and not to exceed any ceilings (limits) placed on expenditures in certain categories.

State funding amounts have limits on expenditures for student support services, administrative costs, tutor training, institutional instruction, and high school equivalency test preparation programs. Federal funding amounts used for institutional education and administrative expenditures are also limited. Funding in these categories may not be changed without approval from the division.

The Division of Adult Education Quarterly report must be submitted for each program (054, 061, 064, and 099). It is necessary to submit two or three reports for the 064 program – one for federal funds, one for state funds and, if applicable, one for Optional Tutoring Program funds. The reports are due regardless of whether the program received cash within a quarter. This form is in addition to the Reconciliation of Cash on Hand report that is required to be completed in the FAI System.

The Division of Adult Education Quarterly Report must be submitted to the division by the tenth business day of October, January, and April.

The reports are to be completed electronically using the eGrants system. The instructions for completing the 054, 061, and 099 reports are as follows:

1. Go to the [eGrants website](#).
2. Log in to the eGrants system using your username and password.
3. Click on “Grant Application.”
4. Select the grant.
5. Click the green checkmark.
6. Select “Interim Reporting.”
7. Click the “Create/Start” button.

The instructions for completing the 064 Federal, 064 State, and, if applicable, 064 State Optional Tutoring Program reports are as follows:

1. Go to the [eGrants website](#).
2. Log in to the eGrants system using your username and password.
3. Click on “Grant Application.”
4. Select the 064 grant.
5. Click the green checkmark.
6. Scroll to the bottom of the screen and select either the Federal, State, or State Optional Tutoring Program sub grant application
7. Click the green checkmark
8. Select “Interim Reporting.”
9. Click the “Create/Start” button.
10. Repeat the process for the other sub grant applications.

Data is saved when using the “Next” button located at the bottom right corner of each page. However, data will not be saved when navigating from page to page using the tabs located at the top of each page.

**Note:** Any Division of Adult Education Quarterly Report received after the due date may result in suspension of monthly contract payments until the report is submitted to the division.

### 613.3 Final Expenditure Report (PDE 5040)

The final expenditure report (FER) for each federal and state contract must be submitted at the end of the contract period. The salary section requires that each staff member be entered individually by function code and object code. This report must be submitted for each program (054, 061, 064, and 099). It is necessary to submit two or three final expenditure reports for the 064 program – one for federal funds, one for state funds and, if applicable, one for state Optional Tutoring Program funds. Submit all 064 reports at the same time.

The final expenditure report must be completed electronically using the eGrants system. Instructions for completing the final expenditure report for the **054, 061, and 099** grants are as follows:

1. Go to the [eGrants website](#).
2. Log in to the eGrants system using username and password.
3. Select the appropriate year.
4. Under “Grants Management,” select “Grant Application.” The status must show as “Completed.”
5. Under “Grant Type,” select the applicable Grant and Folder on right.
6. At the right, click on “Supporting Grants.”
7. Under “Supporting Program Type,” select “Final Expenditure Report” as the “Supporting Program Type.”
8. When the window refreshes, select “Final Report” as the “Project Type.”
9. Click “Create.”

Instructions for completing the final expenditure report for the **064** grant are as follows:

1. Go to the [eGrants website](#).
2. Log in to the eGrants system using username and password.
3. Select the appropriate year.
4. Under “Grants Management,” select “Grant Application.” The status must show as “Completed.”
5. At the bottom of the screen, select either Federal, State, or State Optional Tutoring Program.
6. At the right, click on “Supporting Grants.”
7. Select “Final Expenditure Report” as the “Supporting Program Type.”
8. When the window refreshes, select “Final Report” as the “Project Type.”
9. Click “Create.”

Reports returned to agencies for correction must be resubmitted within ten working days from receipt in order to obtain credit for both timely and accurate submission.

**Note:** Failure to submit final expenditure reports on time and in acceptable form will result in “stop payment” orders for currently approved grants and, possibly, the disapproval of pending grant applications for renewal of grants in the following program year.

### 613.3.1 Additional Instructions for Specific Sections

To support PDE's financial and program reporting requirements related to Title II of WIOA, programs must report grant expenditures in several categories.

#### *613.3.1.1 Local match: 064, 061*

Grantees report local match in two categories: cash and third-party in-kind contributions. Uniform Guidance § 200.96 defines third-party in-kind contributions as “the value of non-cash contributions (i.e., property or services) that (a) benefit a federally assisted project or program; and (b) are contributed by non-Federal third parties, without charge, to a non-Federal entity under a Federal award.” Costs in support of the adult basic education program that are paid by the grantee agency with local funds will be reported as cash.

#### *613.3.1.2 Activity summary: 064, 061, 054*

Programs must report total **actual expenditures** by the four activities listed in the Agency Activity Summary: Community-based adult basic education activities; community-based adult secondary education/high school equivalency activities; institutional adult basic education activities, and institutional adult secondary education/high school equivalency activities.

#### *613.3.1.3 Infrastructure costs: 064, 061, 054*

Programs must report total expenditures paid from the grant on one-stop/PA CareerLink® infrastructure costs described in AA1.3.2. Infrastructure costs do not include shared personnel costs or other shared service costs.

#### *613.3.1.4 Career services: 064, 061*

Programs must report total expenditures paid from the grant on the five career services described in AA1.3.1. The amount should be determined by totaling expenditures for intake, orientation, and initial assessment (pretesting) from FC 1691 and FC 2122 and for information and referral services provided in FC 2122 and FC 2160. Programs should report only those expenditures that align directly with the five career services.

#### *613.3.1.5 Occupational training: 064, 061*

Programs must report total expenditures for the occupational training portion of an integrated education and training program that were paid with grant funds. Do not include expenditures for the adult basic education or workforce preparation activities portions of the integrated education and training program.

## 614 Grant Termination and Closeout

Grants may be terminated due to poor program performance, non-compliance with guidelines and policies, lack of adequate federal or state funding, or a mutual agreement between the division and the program. In the event that a grant is terminated, the program must complete all

close out procedures. For a detailed list of procedures, refer to EDGAR, 2 C.F.R. Part 200, sections 200.343-200.345.

## 615 Audits

Entities expending \$750,000 or more in total federal awards during the fiscal year are required to have a Single Audit. Agencies should promptly assess anticipated levels of federal expenditures to determine their need to comply with this requirement. Auditors must use a risk-based approach.

Questions regarding Single Audit may be directed to: Office of Comptroller Operations, Bureau of Audits, located at 555 Walnut Street, 9<sup>th</sup> Floor, Harrisburg, PA 17101, Phone (717) 783-9120, Fax (717) 787-3376. Inquiries may also be sent to the resource account at [ra-BOASingleAuditInquiries@pa.gov](mailto:ra-BOASingleAuditInquiries@pa.gov).

PDE reserves the right to audit the provision of services and the expenditure of funds under any contract or agreement. The grantee will provide the auditor selected by PDE with full and complete access to all records related to the performance of this contract and all persons and employees involved in the performance of this contract.

## 616 Retention of Records

Each grantee shall keep accessible and intact records that support all claims for the project funds relating to the accountability and expenditure of funds for a period of **six years** after the submission of the final expenditure report or until all audits are complete and findings on all claims have been completely resolved, whichever is later. Such records include but are not limited to individual student files, lesson plans, attendance records, staff records, and fiscal records that document information reported to the Commonwealth through data and fiscal reporting systems.

## 700 Submission Dates

| Report/Document  | To             | Due Date   |
|--|----------------|--|
| Manually Signed Signature Pages                            | Division       | 10 business days after grant is submitted or resubmitted                 |
| Updated Program Policies and Procedures                    | Division       | October 1, 2020  |
| Program Improvement/Professional Development Worksheet     | PDS Consultant | September 1, 2020  |
| Quarterly Narrative Reports Section 223 (Leadership)       | Division       | October 15, 2020<br>January 15, 2021<br>April 15, 2021                   |
| Reconciliation of Cash on Hand Quarterly Report (PDE 2030) | FAI system     | Ten business days after the end of a quarter in which funds are received |



DRAFT

| Report/Document                                   | To       | Due Date  |
|---|----------|---|
| Division of Adult Education Quarterly Report      | Division | October 15, 2020<br>January 15, 2021<br>April 15, 2021                          |
| Budget Revisions (PDE 5036)                       | Division | June 15, 2021   |
| Data Quality Validation Form                      | Division | July 23, 2021   |
| Adult Postsecondary Enrollment Certification Form | Division | Forms should be submitted to the division promptly throughout the program year. |
| IELCE Final Report                                | Division | July 30, 2021   |
| Final Expenditure Report (PDE 5040)               | Division | August 16, 2021   |
| Final Narrative Report Section 223 (Leadership)   | Division | September 15, 2021  |
| Corrections education survey                      | Division | TBD   |
| Workforce System Activities survey                | Division | TBD   |

## 800 Glossary

### 801 Adult Basic Education (ABE)

ABE is a program of instruction designed for adults who lack competence in reading, writing, speaking, problem solving, or computation at a level necessary to function in society, on a job, or in the family.

### 802 Adult Education

As defined in WIOA, adult education is academic instruction and education services below the postsecondary level that increase an individual's ability to

1. 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;
2. transition to postsecondary education and training; and
3. obtain employment.

Pennsylvania Act 143 defines "adult literacy education" as "an educational program designed to provide basic skills training in mathematics, reading, and English, including English as a secondary language.

In Family Literacy, the adult education component is designed to extend basic education skills using a curriculum whose context is the family.

803 Adult Secondary Education (ASE)

Instruction designed for adults who have some literacy skills and can function in everyday life but who are not proficient or do not have a certificate of graduation or its equivalent from a secondary school.

804 Community-Based Organization (CBO)

A private nonprofit organization (which may include a faith-based organization) that is representative of a community or a significant segment of a community and provides educational or related services to individuals in the community.

805 Corrections Education Program

Adult education and literacy services for the adult who is an inmate, patient, or resident of a correctional institution (see definition). Priority must be given to serving individuals who are likely to leave the correctional institution within five years of participation in the program.

806 Correctional Institution

As defined in WIOA, any prison, jail, reformatory, work farm, detention center, halfway house, community-based rehabilitation center, or any other similar institution designed for the confinement or rehabilitation of criminal offenders.

807 Distance Learning

Formal learning activity where students and instructors are separated by geography, time or both for the majority of the instructional period. Distance learning materials are delivered through a variety of media including, but not limited to, print, audio recording, videotape, broadcasts, computer software, web-based programs and other online technology. Teachers support distance learners through communication via mail, telephone, e-mail or online technologies and software

808 Educational Functioning Level (EFL)

NRS places educational skill sets into 12 educational functioning levels. Upon assessment, students are entered into a level based on their demonstrated abilities and complete a level when their post assessment shows mastery of all skills at that educational functioning level. For details on the skills assigned to each functioning level, refer to the *Technical Assistance Guide for Performance Accountability under the Workforce Innovation and Opportunity Act*.

809 Early Childhood Education

The early childhood component of family literacy consists of both preschool and school-age instruction based on sound, proven curricula for children from birth to third grade and focused on the broad developmental skills.

810 English Language Acquisition Program

As defined in WIOA, an English language acquisition program is a program of instruction designed to help individuals who are English language learners achieve competence in reading,

writing, speaking, and comprehension of the English language and that leads to attainment of a secondary school diploma or its recognized equivalent, and transition to postsecondary education and training or employment.

811 Faith-based Organization

A nonprofit organization founded by a religious congregation or religiously motivated incorporators and board members that clearly states in its name, incorporation, or mission statement that it is a religiously motivated institution.

812 Family Literacy

Family literacy addresses the intergenerational nature of illiteracy, by promoting adult literacy, empowering parents to support the educational growth of their children, providing developmentally appropriate early childhood services, and preparing children for school success. Family literacy consists of the following four components: adult education, parent education, early childhood education, and interactive literacy activities (ILA).

813 Financial Literacy

The ability to read, analyze, manage, and communicate about the personal financial conditions that affect material well-being.

814 Health Literacy

The ability to read, understand and use healthcare information to make decisions and follow instructions for treatment and for living a healthy lifestyle.

815 High School Equivalency Testing

High school equivalency tests enable individuals who have not graduated from high school to demonstrate the attainment of abilities normally associated with completion of a high school program of study.

816 Institution of Higher Education

Operating institutions of higher education in Pennsylvania that are legally authorized to grant degrees. This includes state universities, state-related Commonwealth universities, community colleges, private state-aided institutions, private colleges and universities, theological seminaries, private two-year colleges, specialized associate degree granting, and other colleges and universities. For a complete listing go to [PA Institutions of Postsecondary & Higher Education Map](#).

817 Integrated English Literacy and Civics Education

Education services provided to English language learners who are adults, including professionals with degrees and credentials in their native countries, that enable such adults to achieve competency in the English language and acquire the basic and more advanced skills needed to function effectively as parents, workers, and citizens in the United States. Such services include instruction in literacy and English language acquisition and instruction on the

rights and responsibilities of citizenship and civic participation, and may include workforce training.

818 Interactive Literacy Activities (ILA)

The ILA component of a Family Literacy program consists of regularly scheduled sessions for parent-child interaction in which parents and children learn and play together as a family unit and acquire ideas for transferring learning to the home.

819 Local Education Agency (LEA)

A board of education or other legally constituted local school authority having administrative control and direction of public elementary or secondary schools in a city, county, township, school district, or political subdivision in a state, or any other public educational institution or agency having administrative control and direction of a career and technical education program.

820 Non-profit Agency

An incorporated organization that exists for educational or charitable reasons and from which its shareholders or trustees do not benefit financially.

821 Other Institutional Program

Adult education and literacy services offered in institutions such as a community-based rehabilitation facility or halfway house, mental institution, rehabilitation facility, or hospital.

822 Parenting Education

Parenting Education is a component of Family Literacy that focuses on strengthening parents' support of their children's literacy development and early school success.

A parent may be a biological or adoptive parent, or legal guardian or other person standing *in loco parentis*. The Latin phrase *in loco parentis* refers to a person acting in place of a parent or legal guardian, either with whom the child lives or who has been designated by a parent, legal guardian, or court to act in place of the parent, legal guardian, or court.

823 Primary Indicators of Performance Targets

WIOA establishes six common indicators of performance, which apply to all six core programs authorized under the law, including adult education. States are required to establish performance targets for each of these performance indicators. Failure to meet the targets can result in sanctions for the state. The six indicators of performance are Employment in the Second Quarter after Exit, Employment in the Fourth Quarter after Exit, Median Wages in the Second Quarter after Exit, Credential Attainment, Measurable Skill Gain, and Effectiveness in Service Employers. (Refer to Policy C.100 and Policy C.135 for more information.)

824 Priority of Service

Services provided based on needs of local workforce areas in terms of employment skills, high-priority occupations, density of population, special needs (such as English language learners), or incarceration.

825 Program Year

The Program Year shall be designated the same as the commonwealth's fiscal year – July 1 through June 30, unless otherwise noted in the contract.

826 Public Housing Authority

A public agency created by a state or local government to finance or operate low-income housing.

827 Special Needs Services

Instruction designed for adult learners who demonstrate characteristics of one or more of the following classifications: mental retardation, severe emotional illness, brain injury, severe visual impairment, severe hearing impairment, or specific learning disabilities.

828 Support Services

Support services enable eligible adult learners and children to participate in and benefit from an adult and family literacy education program. Support services include but are not limited to, transportation, child care, non-educational personal counseling, and referral to other services available in the community. (For more information, refer to Section 302.2 and 607.4)

829 State Leadership

Projects funded under Section 223 of WIOA, including professional development activities.

830 Volunteer Literacy Organization

Program that provides literacy education through the use of unpaid volunteer instructors.

831 Workforce Preparation Activities

Activities, programs, or services designed to help an individual acquire a combination of basic academic skills, critical thinking skills, digital literacy skills, and self-management skills, including competencies in utilizing resources, using information, working with others, understanding systems, and obtaining skills necessary for successful transition into and completion of postsecondary education or training, or employment.

832 Workplace Adult Education and Literacy Activities

Adult education and literacy activities offered by an eligible provider in collaboration with an employer or employee organization at a workplace or an off-site location that is designed to improve the productivity of the workforce. Instruction may be for incumbent workers or for those preparing for employment with a company. On-site analysis of job tasks is used to select which skills instruction addresses.

## Appendices

### Appendix A

#### Adult Basic and Literacy Education (State and Federal 064)

The information in this section is specific to agencies using federal and state funds to provide adult basic and literacy education. This appendix is to be used in conjunction with the *Adult Education and Family Literacy Guidelines* issued by the Division of Adult Education.

#### AA1 Full Service Program

**Programs receiving federal and state Adult Basic Education Direct Service 064 grants through the Division of Adult Education must provide a full range of service during the course of a program year.****AA1.1 Services**

Programs must provide the following to be considered full service:

- Year-round classroom instruction and support services, including during the summer. Programs may have a reduced schedule over the summer but must ensure access to instruction and support services.
- Adult education and literacy activities and instruction for adult basic education students at all educational functioning levels from Beginning Literacy Adult Basic Education (ABE) to High Adult Secondary Education (ASE), including high school equivalency test preparation as needed.
- English language acquisition activities and instruction for English-as-a-Second Language (ESL) students based on area needs. Such instruction must include supporting ESL students to transition successfully to ABE/ASE instruction within the programing funded by the grant and to earn a high school equivalency credential, if needed.
- Supplemental distance learning opportunities to students participating in direct, real-time instruction, either in person or remote instruction.
- Referral and support of appropriate students to the distance learning project, as appropriate.
- Support services to help students address barriers to participation.
- Support services to help students identify education and career goals, develop employability skills, and successfully transition to postsecondary education/training and/or employment, as appropriate.
- Integration of workforce preparation activities into instruction and support services.
- A cadre of volunteer classroom aides to provide additional instructional support to students participating in classroom instruction. (All grant recipients must use at least five percent of the state grant funds to support a tutoring program that recruits, trains, and supports volunteer classroom aides, except those that are not eligible providers under state law.)
- A program administrator who is a full-time employee of the grantee agency. If the program administrator is not working 100 percent on division-funded activities, the agency must provide evidence that this individual has sufficient time allocated to these activities to meet all of the requirements of the program administrator position. (Note: The program administrator does not have to be paid from grant funds; however, the person must have sufficient time allocated to activities supported by the grant.)
- Be a partner at a local PA CareerLink® site and fulfill all the roles and responsibilities of a one-stop partner, including entering into a Memorandum of Understanding (MOU) with the

local workforce board, contributing to infrastructure costs of the PA CareerLink® site, providing access to adult basic education services through the PA CareerLink® site, and providing career services to eligible one-stop participants.

## **AA1.2 Transitioning ESL Students**

Programs must have a process to transition ESL students who reach the exit level criteria on their ESL assessment into ABE/ASE classes. This can be done by placing ESL students in classes with native speaking students or by offering ABE/ASE classes specifically for transitioning ESL students. Transitioning ESL students must take an assessment approved for ABE/ASE prior to entry into an ABE/ASE classroom.

## **AA1.3 One-Stop Partner Roles and Responsibilities**

WIOA requires local workforce areas to have a one-stop delivery system, branded nationally as the American Job Center Network. Adult basic education funded under Title II, WIOA is a mandated partner in the one-stop delivery system. In Pennsylvania, all programs receiving federal adult education funds through an Adult Basic Education Direct Service (064) grant or an Integrated English Literacy and Civics Education (061) grant are required to fulfill the roles and responsibilities of the one-stop partner and must enter into an MOU with the local board, including contributing to infrastructure costs at the one-stop center. Division-funded programs are not required to be co-located at the one-stop center (PA CareerLink® site); however, all division-funded programs must provide direct access to their services through the center. Local programs must display the American Job Center branding by adding the statement “a proud partner of the American Job Center network” on materials related to work as part of the one-stop delivery system. (Reference Policy G.100)

### **AA1.3.1 Career Services**

WIOA requires that one-stop partners make the career services applicable to adult basic education activities available through the one-stop system, either at the one-stop center or at any other appropriate location. Appropriate locations for division-funded programs include all sites at which the services listed in AA1.1 above are provided.

*Program Memorandum OCTAE 17-1 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:*

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
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 CHIP; SNAP benefits; EITC; assistance under TANF, and other supportive services and transportation)

### **AA1.3.2 Infrastructure Costs**



WIOA requires one-stop partners to contribute to the infrastructure costs of the one-stop center. For this purpose, infrastructure costs are defined as non-personnel costs that are necessary for the general operation of the one-stop center, including:

1. Rental of the facilities;
2. Utilities and maintenance;
3. Equipment (including assessment-related products and assistive technology for individuals with disabilities);
4. Technology to facilitate access to the one-stop center, including technology used for the center's planning and outreach activities; and
5. Common identifier costs

One-stop partners negotiate their contributions based on proportionate use and relative benefit. Infrastructure costs paid from federal Title II funds (in Pennsylvania, either the federal portion of the Adult Basic Education Direct Service 064 grant or the Integrated English Literacy and Civics Education Program 061 grant) are administrative costs and are subject to the 5 percent administrative cap explained in section 604.2.1 of these guidelines.

## **AA2 Corrections Education**

Programs may use up to 20 percent of federal and state funds for corrections education and education for other institutionalized individuals. Programs planning to increase the amount of grant funds spent on corrections education over the previous year's amount must notify their advisor prior to submitting a grant renewal application or adding new classes during the program year. All classes held in correctional facilities or other institutions must meet the requirements laid out in these guidelines in Section 402.3.

### **AA2.1 Use of Funds**

The funds shall be used for the cost of educational programs for criminal offenders in correctional institutions and for other institutionalized individuals, including academic programs for:

1. Adult education and literacy activities (required);
2. Special education, as determined by the eligible program;
3. Secondary school credit;
4. Integrated education and training;
5. Career pathways;
6. Concurrent enrollment;
7. Peer tutoring; and
8. Transition to re-entry initiatives and other post-release services with the goal of reducing recidivism.

### **AA2.2 Priority**

Each eligible program that is using assistance provided under this section to carry out a program for criminal offenders within a correctional institution shall give priority to serving individuals who are likely to leave the correctional institution within 5 years of participation in the program.

## **AA2.3 Additional State-Required Data Collection and Reporting**

Sec. 225 of WIOA requires states to report on the relative rate of recidivism for individuals who participate in corrections education programs while incarcerated. The Division of Adult Education will use the State Identification Number (SID) to support a data match to meet the federal reporting requirement. Programs intending to serve corrections education students must enter into a MOU with the correctional facility that ensures that SID information is provided for adult education students served in the facility. The MOU must also include wording that ensures that the adult basic education program will be able to hold classes that meet all division requirements. Programs cannot provide services in a correctional facility unless they have a signed MOU. In addition, programs providing corrections education will be required to submit a narrative report describing the activities provided during the program year and providing recidivism data from the correctional facility. (Reference Section 700)

## **AA3 Tutor Training**

Pennsylvania Act 143 requires that at least 20 percent of the annual state appropriation used for adult basic education programs be used to train volunteer adult education instructors/tutors. To meet this requirement, the division has established one required activity and one optional activity for programs.

**Required:** As full service providers, all adult basic education programs are expected to use at least 5 percent of the state 064 grant to recruit, train, and support a cadre of volunteer classroom aides (see section 604.2.2).

**Optional:** Adult basic education programs that applied for and were awarded additional tutoring program funds must recruit, train, and support volunteer tutors to provide one-on-one and/or small group instruction.

### **AA3.1 Required: Volunteer Classroom Aide program**

#### **AA3.1.1 Staffing**

1. Programs must have a tutor coordinator to recruit, train, and support volunteer classroom aides. See sections 204.6 and 501.3 of these guidelines for more information on the roles and responsibilities of the tutor coordinator.
2. A volunteer classroom aide provides in-class support to a student or students who are in a class or group. The volunteer classroom aide is not responsible for instructional planning. The classroom instructor or the tutor coordinator should provide materials for the aide to use and guidance on how to use the materials. Volunteer classroom aides must have at least a high school diploma or its equivalent and have the content knowledge to effectively support students.

Only activities directly related to the recruitment, training, and support of volunteer classroom aides may be used to meet the 5 percent requirement. Funds may not be used for administrative costs or costs associated with the provision of services to students served by the aides.

## **AA3.2 Optional: Community-based Tutoring Program**

### **AA3.2.1 Staffing**

1. Programs receiving additional state 064 funds for a community-based tutoring program must have at least one tutor coordinator who works at least 20 hours per week on tutoring program activities. The division strongly recommends that the tutor coordinator be a dedicated full-time position. See sections 204.6 and 501.3 of these guidelines for more information on the roles and responsibilities of the tutor coordinator.
2. Volunteer tutors provide one-on-one or small group instruction to students for a minimum of three hours per week. They must have a bachelor's degree or be participating in an Americorps program. Volunteer tutors are required to have written lesson plans for all tutoring/small group sessions and should work with tutor coordinators to review goals and adjust student placement, as needed. Volunteer tutors may not administer the standardized assessments used by the agency for reporting purposes unless they have completed the mandatory assessment training. Volunteer tutors are required to participate in initial tutor training and additional professional learning opportunities while at the program.

### **AA3.2.2 Other requirements**

1. Programs must have volunteer tutors complete the program's local adult education staff orientation.
2. Programs must have volunteer tutors complete initial tutor training prior to pairing them with students. Initial tutor training must include all of the following:
  - a. Minimum number of weekly tutoring hours required for a tutoring pair/small group;
  - b. Procedures for documenting and reporting student attendance hours;
  - c. Information on available program support services;
  - d. Goal setting;
  - e. Lesson routines;
  - f. Teaching adults;
  - g. Teaching strategies;
  - h. Lesson planning; and
  - i. Using resources and materials.
3. Programs must have written policies and procedures for the tutoring program to ensure compliance with all requirements.
4. Only activities directly related to the recruitment, training, and support of volunteer tutors may be covered by the additional tutoring program funds. Funds may not be used for administrative costs or costs associated with the provision of services to students served by the tutors.

## **AA3.3 Optional: Peer Tutoring Program**

### **AA3.3.1 Definition**

Peer tutoring is an instructional model that uses one institutionalized individual to assist in providing or enhancing learning opportunities for other institutionalized individuals. A peer tutoring program must be structured and overseen by educators who assist with training and supervising tutors, setting educational goals, establishing an individual plan of instruction, and monitoring progress (WIOA regulations 463.3).

### AA3.3.2 Staffing

1. Peer tutoring program coordinator: The peer tutoring program coordinator is responsible for structuring, coordinating, and overseeing the peer tutoring program. This person is responsible for recruiting, training, and supervising tutors, setting educational goals, establishing the individual plan of instruction for each student in the program, developing lesson plans for the peer tutors to use and/or assisting peer tutors to develop lesson plans, and monitoring progress. The peer tutoring coordinator should be trained to administer the standardized assessments used by the program for reporting purposes.
  - a. Must be a full time dedicated position.
  - b. Minimum qualifications: bachelor's degree and previous experience as an educator, preferably with adults, and as an instructional leader.
2. Peer tutor: A peer tutor is an institutionalized individual who assists in providing or enhancing learning opportunities for other institutionalized individuals. Peer tutors may not administer the standardized assessments used by the program for reporting purposes.

### Must have a high school diploma/equivalent.AA3.3.3 Other Requirements

1. Programs must develop a process to document instruction that takes place when the peer tutoring program coordinator is not present. All instructional hours reported to the division must be verifiable.
2. Programs must have written policies and procedures for the peer tutoring program to ensure compliance with all requirements.
3. Funds used for the peer tutoring program count towards the 20 percent cap on state grant funds for corrections education (see section AA2) and must be reported appropriately in the FER in the institutional categories in Agency Summary (see section 613.3.1).

## Appendix B Section 243 Integrated English Literacy and Civics Education Program

The information in this section is specific to agencies receiving adult education funds to provide Integrated English Literacy and Civics Education (IELCE) programs (061 grants). This appendix is to be used in conjunction with the *Adult Education and Family Literacy Guidelines* issued by the Division of Adult Education.

### AB1 Requirements for Integrated English Literacy and Civics Education Programs

#### AB1.1 Program Requirements

Section 243 IELCE funds must provide instruction in literacy and English language acquisition and instruction in the rights and responsibilities of citizenship and civic participation and instruction and services that are designed to prepare adults who are English language learners for, and place such adults in, unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency and integrate with the local workforce development system. (Reference Title II, WIOA, section 243)

Among the eligible participants as defined in WIOA and identified in section 203.1 of these guidelines, PDE believes that participants who have a postsecondary and/or employment goal and who enter the section 243 program at one of the six NRS ESL EFLs as determined by an approved official assessment may benefit most from the services under section 243. This includes participants who posttest at Exit Criteria for ESL and are then assessed at ABE/ASE levels while participating in the section 243 program.

PDE requires all IELCE programs to have the following:

- Year-round leveled, managed enrollment IELCE classroom activities and support services, including during the summer. See section 403.1 for the definition of managed enrollment. IELCE activities must support IELCE Program participants to prepare for and transition successfully to the integrated education and training activity and to earn a high school equivalency credential, if needed, as part of the training activity.
- At least one integrated education and training activity, which must be held a minimum of once per program year. All students who enroll in the integrated education and training activity must have completed at least one session of IELCE activities before enrolling in the integrated education and training activity.
- Agency-specific performance targets established through negotiation with the Division of Adult Education, which the program meets in each year of the grant cycle.
- Support services to help students address barriers to participation.
- Support services to help students identify education and career goals, develop employability skills, and successfully participate in and complete postsecondary education/training and gain employment.
- Integration of workforce preparation activities into instruction and support services.
- A plan for ensuring student access to grant activities, including participation in the integrated education and training activity.
- A program administrator who is a full-time employee of the grantee agency. If the program administrator is not working 100 percent on division-funded activities, the agency must provide evidence that this individual has sufficient time allocated to these activities to meet all of the requirements of the program administrator position. (Note: The program administrator does not have to be paid from grant funds; however, the person must have sufficient time allocated to activities supported by the grant.)
- Partnership at a local PA CareerLink<sup>®</sup> site and fulfillment of all the roles and responsibilities of a one-stop partner, including entering into a Memorandum of Understanding (MOU) with the local board, contributing to infrastructure costs of the PA CareerLink<sup>®</sup> site, providing access to grant services through the PA CareerLink<sup>®</sup> site, and providing career services to eligible one-stop participants.
- Integration with the local workforce development system and its functions to place participants in the IELCE Program in unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency.
- Signed partnership agreement with a training provider to deliver the training portion of the integrated education and training activity.

### **AB1.1.2 Specific Requirements for the Integrated English Literacy and Civics Education Activity**

As defined in federal statute and regulations, IELCE services must include instruction in English literacy, English language acquisition, and the rights and responsibilities of citizenship and civic

participation. In addition, PDE has established the following state-specific requirements for IELCE activities under a section 243 IELCE program:

1. The program must offer at least two levels of IELCE activity classes year round.
2. In the context of the section 243 IELCE program, leveled classes means that classes include students in no more than two NRS levels per class. Programs may serve beginning ESL level students as part of their IELCE activities or may elect to serve them with other funds. There must be a path into the section 243 IELCE program for beginning level students.
3. The three components of an IELCE activity must be integrated and delivered concurrently and contextually.
4. To support successful transition to and completion of the integrated education and training activity, programs should assess IELCE students' speaking, listening, reading, and writing skills prior to enrolling students in the integrated education and training activity. Programs may use a combination of standardized, formal, and informal assessments for this purpose.
5. Agencies must have an section 243 IELCE program-specific attendance policy that supports the development of self-management skills necessary to succeed in the integrated education and training activity and employment.

### **AB1.1.3 Specific Requirements for Integrated Education and Training Activity**

The integrated education and training activity must meet federal regulations and the additional requirements imposed by the Division of Adult Education (see [section 403.1.4](#) of these guidelines).

1. All IELCE programs must provide at least one integrated education and training activity per year specifically and exclusively for IELCE program participants. However, a section 243 program participant may participate in a different integrated education and training activity at the agency if the agency also provides a division-approved integrated education and training activity under the 064 grant or with braided funding.
2. In the context of the integrated education and training activity, integrated means that the adult education and literacy activities, workforce preparation activities, and workforce training be delivered concurrently and contextually; have a single set of learning objectives that identifies specific content and competencies; and the components function cooperatively. This means that not only do the adult education and literacy activities support the ability of participants to succeed in the training, but that the occupational training must also formally and transparently reinforce the learning happening in adult education and workforce preparation components.
3. Agencies may request to change the training focus of the integrated education and training activity proposed in the initial grant application if there is an unforeseen change in conditions. The request must include a detailed justification for the change, including an updated analysis of the workforce needs in the local area with input from the local board.
4. Agencies may propose additional integrated education and training activities during the grant cycle. Each proposal for an additional integrated education and training activity is subject to the full submission, review, and approval process.

### **AB1.1.4 Annual and Ongoing Program Reporting**

1. Agencies that receive section 243 IELCE grants will submit a final report to the division that contains optional outcome measures for civics education programs and quantitative and qualitative data related to learner outcomes.

2. Agencies must meet the agency-specific targets that were established during the grant award approval process and must provide quarterly progress reports to their advisor.
3. Agencies must have a system for tracking and reporting completion of occupational training and attainment of related credentials.

## AB2 Civics Content

IELCE activities must include instruction in the rights and responsibilities of citizenship and civic participation. PDE requires programs to use the [IELCE Civics Content Guide](#) for curriculum development and lesson planning. The civics content of the IELCE activity must fall under one or more of the following topic areas:

1. The Democratic Process
2. Community Resources
3. The US School System
4. Housing
5. Employment
6. Health and Wellness
7. Consumer Economics
8. US History/Geography

## AB3 Setting and Documenting Outcome Measures for Civics Education Programs

### AB3.1 Definitions

The [Technical Assistance Guide for Performance Accountability under the Workforce Innovation and Opportunity Act](#) defines each measure as follows:

1. Achieved citizenship skills: Participant attains the skills needed to pass the U.S. citizenship exam
2. Voter Registration: Participant registers to vote or votes for the first time anytime during the program year.
3. Involvement in community activities: Participant increases involvement in the following community activities:
  - a. Attending or organizing meetings of neighborhood, community, or political organizations;
  - b. Volunteering to work for such organizations;
  - c. Contributing to the support of such organizations; and/or
  - d. Volunteering to work on community improvement activities.

PDE further defines this outcome as activities that occur outside of regular classroom hours, although these activities may be facilitated by the teacher as a group activity. This measure **does not** include demonstrating life skills.

### AB3.2 Goal Setting Criteria

1. Achieve citizenship skills: Must be set for all learners in a section 243 IELCE class.



2. Register to vote: Should be set for all learners who, at time of enrollment, are not registered to vote and have this as their goal.
3. Vote for the first time: Should be set for all learners who, at time of enrollment, have never voted and have this as their goal.
4. Involvement in community activities: Should be set for all learners in a section 243 IELCE class who have this as their goal.

### **AB3.3 Reporting**

1. Achieve citizenship skills: Total number of enrolled learners who obtain skills to pass the citizenship exam
2. Register to vote: Total number of enrolled learners who have this as a goal who register to vote.
3. Vote for the first time: Total number of enrolled learners who have this as a goal who vote for the first time.
4. Involvement in community activities: Total number of enrolled learners who have this as a goal who increase community involvement in any measure (a, b, c, or d above).

### **AB3.4 State Required Documentation**

1. Achieve citizenship skills:
  - a. Learner passes the citizenship exam OR
  - b. There is documentation in the form of an end-of-course assessment or any independently completed assignment in the student file in which the student shows independent knowledge of a minimum of three items from the following list:
    - U.S. history and/or geography
    - U.S. governmental structure and function
    - Naturalization process
    - Rights and responsibilities of citizenship
    - U.S. workplace culture and basics of employment laws
    - U.S. legal system
2. Register to vote: Learner shows the instructor his/her voter registration card, and the instructor documents this in the student file.
3. Vote for the first time: Learner self-report, documented by the instructor in the student file.
4. Involvement in community activities: Learner self-report. Activity must be documented in the student file.

## **Appendix C Act 143 Family Literacy**

The information in this section is specific to agencies receiving funds to provide four-component family literacy programs. This appendix is to be used in conjunction with the *Adult Education and Family Literacy Guidelines* issued by the Division of Adult Education

### **AC1 Additional Requirements for Family Literacy Programs**

#### **AC1.1 Focus**

Family literacy programs include four instructional components and must use instructional programs for children and adults that are based on reading research and best practice to increase the probability that adults will improve their literacy skills, children will enter school prepared to learn to read, and parents will be able to help their children succeed in school. Programs must use a variety of instructional models, including in-person instruction and distance learning options, to support families' access to instruction and family literacy activities of sufficient intensity to achieve educational gains and family outcomes in a timeframe that meets families' needs.

## **AC1.2 Adult Education**

The adult education curriculum should be delivered in the context of the family. The adult education component is designed to:

1. Assist adults to become literate and obtain the knowledge and skills necessary or lead to employment and economic self-sufficiency; and
2. Lead to sustainable improvements in the economic opportunities for their family.

### **AC1.2.1 Non-duplication of Services**

State Act 143 family literacy grants are to serve eligible adults not currently enrolled in another state or federally funded adult education program.

## **AC1.3 Early Childhood Education (ECE)**

The ECE component for family literacy programs must contain high-quality preschool programming, preferably in collaboration with an existing provider such as Head Start, Title I, and/or state approved childcare facilities and school-based curricula for children from birth to third grade. It should be based on a sound early childhood curriculum and focus on the broad developmental skills that emerge during the child's preschool years. In the program, the child's cognitive, physical, social, and emotional skills are developed through active exploration and investigation, personal discovery, reorganization of his/her physical environment, and verbal interaction with peers and adults.

For the ECE component, family literacy programs should collaborate whenever possible with a local early childhood provider, and children should attend classes as scheduled by the collaborating partner. If no local partnership exists, the early childhood education component may be provided by the family literacy program.

ECE classes provided by the family literacy program itself must offer high-quality curriculum-based instruction led by a qualified instructor while the parents are attending classes. The most effective approaches include creating classroom environments rich in age-appropriate print (from sources such as books, labeling, the alphabet, and children's pre-writing work); teachers who deliver intentional, contextualized, and explicit instruction that supports children's age-appropriate development of oral language, phonological awareness, print awareness, and alphabet knowledge; monitoring progress to determine which skills children are learning; and intensive, ongoing professional development that includes mentoring and coaching in the classroom.

## **AC1.4 Parent Education**

The parent education component strengthens parents'/caregivers' support of their young children's literacy development and early school success. Parent education blends the practices of parent support groups and parent education groups to meet the needs of the families in the program. In parent education, parents/caregivers learn the theory behind child development and learning behaviors, learn techniques to promote language and literacy development, practice with peers to develop understanding of concepts, and receive constructive and supportive feedback after completing the ILA with their own children. Programs must provide sufficient time and intensity of parent education to support parents/caregivers to master the skills and knowledge they need to support their children's learning.

### **AC1.5 Interactive Literacy Activities**

The ILA component consists of regularly scheduled sessions for parent-child interaction when parents/caregivers and children learn and interact together as a family unit. ILA and parent education are closely connected so that the knowledge gained by the parents/caregivers during parent education can be applied during the ILA time.

ILA activities should be introduced and modeled by an instructor, either in person or remotely. Instructors are expected to observe families practicing these techniques and to support family success in applying them. Parents/caregivers may then apply these lessons and techniques with their children at home. Off-site ILA conducted by parents/caregivers without instructor facilitation/supervision must be documented and be discussed during a subsequent parent education session.

### **AC1.6 Eligible Family Literacy Children and Parent Participants**

Family literacy programs are required to target at risk families who have educational needs and who are able to fully participate in all aspects of the family literacy program. Programs must give priority to families living in areas containing high concentrations of poverty and focus services to address the needs of individuals receiving Temporary Assistance to Needy Families (TANF) benefits.

An eligible adult is a person who meets the following criteria:

1. Is at least 17 years of age;
2. Is a Pennsylvania resident; and
3. Is not currently enrolled in a public or private secondary or postsecondary school.

An eligible parent is an eligible adult who has one or more children ages birth through third grade. The term includes a legal guardian, grandparent, stepparent, aunt, uncle, sibling or other person with whom the child lives or who has been designated by a parent, legal guardian or court to act in place of the parent.

At least one eligible parent and at least one eligible child must participate in the program. Although a child or parent may be temporarily absent from the program area, the other eligible family members may continue to receive services.

Rather than serving eligible children of all ages, family literacy programs may target services to children at certain age levels, such as pre-school (four years old) through third grade, but it must provide services for at least a three-year age range.

The early childhood component of all family literacy programs must contain a preschool program, preferably in collaboration with an existing provider such as Head Start, Title I, and /or licensed child care.

Other family members, such as grandparents, stepparents, older siblings, etc., may participate in activities and services when such participation would serve family literacy purposes.

### AC1.7 Collaboration

Given the size of the grant and the large number of other local, state, and federal programs focused on adult literacy or early childhood education, it is critical that applicants use these funds as the link to provide a comprehensive family literacy program created from these various sources of support. Local programs must build on existing community resources of high quality – local education agencies and community-based organizations – to build community partnerships. This collaboration should include both program planning and service delivery. Key partners providing services in the four components of the family literacy program include providers such as Head Start, Pennsylvania Pre-K Counts, Family Centers, school district(s) including Title I and K-4 programs, Department of Public Welfare-licensed child care agencies, libraries, county assistance offices, Migrant Education, and 21<sup>st</sup> Century Community Learning Centers.

### AC1.8 Performance Targets

All family literacy programs are held accountable for all the Adult Education and Family Literacy Performance Standards. (Reference Policy C.100)

## Appendix D State Leadership

The information in this section is specific to State Leadership projects. This appendix is to be used in conjunction with the *Adult Education and Family Literacy Guidelines* issued by the Division of Adult Education

WIOA, Title II, Section 222(a)(2) authorizes funding of up to 12.5 percent of the federal allocation for Statewide Leadership activities.

Per Sec 223(a)(1), funds **must** be used for the following adult education and literacy activities to develop or enhance the adult education system in Pennsylvania:

(A) The alignment of adult education and literacy activities with other core programs and one-stop partners, including eligible providers, to implement the strategy identified in the unified or combined State plan, including the development of career pathways to provide access to employment and training services for individuals in adult education and literacy activities.

(B) The establishment or operation of high quality professional development programs to improve the instruction provided pursuant to local activities required under the law, including instruction incorporating the essential components of reading instruction as such components relate to adults, instruction related to specific needs of adult learners, instruction provided by

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volunteers or by personnel of a State, and dissemination of information about models and promising practices related to such programs.

(C) The provision of technical assistance to provide eligible providers of adult education and literacy activities receiving funds under this title, including:

- (i) The development and dissemination of instructional and programmatic practices based on the most rigorous or scientifically valid research available and appropriate, in reading, writing, speaking, mathematics, English language acquisition programs, distance education, and staff training;
- (ii) The role of eligible providers as a one-stop partner to provide access to employment, education, and training services; and
- (iii) Assistance in the use of technology, including for staff training, to eligible providers, especially the use of technology to improve system efficiencies.

(D) The monitoring and evaluation of the quality of, and the improvement in, adult education and literacy activities and dissemination of information about models and proven or promising practices within the State.

Per Sec 223(a)(2), funds **may** also be used for one or more of the following adult education and literacy activities:

(A) The support of State or regional networks of literacy resource centers.

(B) The development and implementation of technology applications, translation technology, or distance education, including professional development to support the use of instructional technology.

(C) Developing and disseminating curricula, including curricula incorporating the essential components of reading instruction as such components relate to adults.

(D) Developing content and models for integrated education and training and career pathways.

(E) The provision of assistance to eligible providers in developing and implementing programs that achieve the objectives of this title and in measuring the progress of those programs in achieving such objectives, including meeting the State adjusted levels of performance.

(F) The development and implementation of a system to assist in the transition from adult education to postsecondary education, including linkages with postsecondary educational institutions or institutions of higher education.

(G) Integration of literacy and English language instruction with occupational skill training, including promoting linkages with employers.

(H) Activities to promote workplace adult education and literacy activities.

(I) Identifying curriculum frameworks and aligning rigorous content standards that:

- (i) Specify what adult learners should know and be able to do in the areas of reading and language arts, mathematics, and English language acquisition; and
- (ii) Take into consideration the following:
  - (I) State adopted academic standards;
  - (II) The current adult skills and literacy assessments used in the State or outlying area.

- (III) The primary indicators of performance;
- (IV) Standards and academic requirements for enrollment in non-remedial, for-credit courses in postsecondary educational institutions or institutions of higher education supported by the State; and
- (V) Where appropriate, the content of occupational and industry skill standards widely used by business and industry in the State.

(J) Developing and piloting of strategies for improving teacher quality and retention.

(K) The development and implementation of programs and services to meet the needs of adult learners with learning disabilities or English language learners, which may include new and promising assessment tools and strategies that are based on scientifically valid research, where appropriate, and identify the needs and capture the gains of such students at the lowest achievement levels.

(L) Outreach to instructors, students, and employers.

(M) Other activities of statewide significance that promote the purpose of this title.

## **AD1 Requirements for all Professional Development Entities**

Each professional development entity within the Adult Education Professional Development System will have a professional development plan outlining the anticipated activities for the contracted year. The plan will be based on program and individual professional development plans, program improvement needs, needs assessments, current research, and evidence-based practices to reflect priorities of the Division of Adult Education.

### **AD1.1 Requirements of Professional Development System Staff**

Project staff should complete an annual professional development plan for their own professional development. Professional developers should be funded to stay grounded in the field, such as spending between two to five percent of their time each year participating in direct service activities, when possible, as recommended in the Association of Adult Literacy Professional Developers (AALPD) policy matrix.

### **AD1.2 Annual and Ongoing Program Reporting**

Recipients of funds administered under Section 223 of WIOA for professional development or any other project deemed as part of the Adult Education Professional Development System, shall submit, as a condition of funding, three quarterly reports, and one final narrative report.

1. Quarterly narrative reports must be submitted to the Division of Adult Education by the tenth business day following the end of each three fiscal quarters.
2. Final narrative reports must be submitted to the division by the last business day of August.

Reports will provide evidence of progress toward and achievement of the goals specified in their grant narratives. Evidence will include both quantitative and qualitative data. In addition, the final report will include an evaluation of project activities.

These reports are in addition to the reports required in section 613.

## **AD2 Budgetary Requirements**

The following items are specific to State Leadership entities. However, all budgetary guidance must be reviewed and complied with in full. Refer to fiscal guidelines for complete information.

### **AD2.1 Object Code 580 – Travel**

In the budget section of the grant, create two separate items under Object Code 580:

- Everyday travel, which includes travel to division or PDS meetings, travel to program sites, and associated travel expenses.
- Conference travel, which includes conference fees, travel to conferences, and associated travel expenses.

### **AD2.2 Object Code 790 – Property**

Generally, equipment is not purchased with Section 223, State Leadership funds. Purchase of equipment with Section 223 funds must be approved by Pennsylvania Department of Education during application review. All other regulations for Object Code 790 apply to Section 223 funds.

## **Appendix E**

### **Administrative Expenditures on Federal 064 and 061 grants**

#### **AE1 Federal Statute and Regulations Governing Administrative Expenditures**

##### **AE1.1 WIOA Sec. 233. Local Administrative Cost Limits**

(a) IN GENERAL.—Subject to subsection (b), of the amount that is made available under this title to an eligible provider—

(1) not less than 95 percent shall be expended for carrying out adult education and literacy activities; and

(2) the remaining amount, not to exceed 5 percent, shall be used for planning, administration (including carrying out the requirements of section 116), professional development, and the activities described in paragraphs (3) and (5) of section 232.

(b) SPECIAL RULE.—In cases where the cost limits described in subsection (a) are too restrictive to allow for the activities described in subsection (a)(2), the eligible provider shall negotiate with the eligible agency in order to determine an adequate level of funds to be used for noninstructional purposes.

##### **AE1.2 34 CFR § 463.25 What are the requirements related to local administrative cost limits?**

Not more than five percent of a local grant to an eligible provider can be expended to administer a grant or contract under title II. In cases where five percent is too restrictive to allow for



administrative activities, the eligible agency may increase the amount that can be spent on local administration. In such cases, the eligible provider must negotiate with the eligible agency to determine an adequate level of funds to be used for non-instructional purposes.

### **AE1.3 34 CFR § 463.26 What activities are considered local administrative costs?**

An eligible provider receiving a grant or contract under this part may consider costs incurred in connection with the following activities to be administrative costs: (a) Planning; (b) Administration, including carrying out performance accountability requirements; (c) Professional development; (d) 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 (e) Carrying out the one-stop partner responsibilities described in § 678.420, including contributing to the infrastructure costs of the one-stop delivery system.

### **AE1.4 34 CFR § 361.720 What funds are used to pay for infrastructure costs in the local one-stop infrastructure funding mechanism?**

(a) In the local funding mechanism, one-stop partner programs may determine what funds they will use to pay for infrastructure costs. The use of these funds must be in accordance with the requirements in this subpart, and with the relevant partner's authorizing statutes and regulations, including, for example, prohibitions against supplanting non-Federal resources, statutory limitations on administrative costs, and all other applicable legal requirements. ... In the case of partners administering adult education and literacy programs authorized by title II of WIOA, these funds must include Federal funds made available for the local administration of adult education and literacy programs authorized by title II of WIOA. These funds may also include non-Federal resources that are cash, in-kind or third-party contributions.

(b) There are no specific caps on the amount or percent of overall funding a one-stop partner may contribute to fund infrastructure costs under the local funding mechanism, except that contributions for administrative costs may not exceed the amount available for administrative costs under the authorizing statute of the partner program. However, amounts contributed for infrastructure costs must be allowable and based on proportionate use of the one-stop centers and relative benefit received by the partner program...

## **AE2 State Guidance Regarding Administrative Expenditures**

Both WIOA and the related regulations make clear that federally funded adult basic education programs are expected to use as much of the grant funding as possible, but no less than 95 percent, for the provision of services to students and that use of more than 5 percent of grant funds to cover administrative costs as defined in WIOA and regulations should be limited to only that which is absolutely necessary. Therefore, any grant funds in excess of 5 percent used for administrative purposes must be truly justifiable and essential to the success of the adult education and literacy activities provided by the program. The Division of Adult Education provides the following guidance to ensure compliant use of federal funds.

### **AE2.1 Section 607.6 of these guidelines**

Section 607.6 of these guidelines provides direction on the appropriate Function Code to use for administrative expenditures and defines administrative expenditures aligned with the definition in WIOA.

## **AE2.2 PA CareerLink® infrastructure cost requirements**

Per Division Policy G.100 Adult Education and the Workforce Development System, all division funded programs receiving federal 064 and 061 funds must use a portion of those funds that are made available for local administration for contributions to PA CareerLink® infrastructure costs. Contributions must be negotiated locally and be based on proportionate use of the PA CareerLink® site and relative benefit received by the adult basic education program. Due to variations in local conditions, proportionate use and relative benefit vary significantly among PA CareerLink® sites. To address these variations, the division recognizes several scenarios impacting the amount of local administrative funds from the federal grant used for contributions to PA CareerLink® infrastructure costs:

1. Grantees that do not use any federal grant funds for PA CareerLink® infrastructure costs. This category includes grantees that pay infrastructure cost contributions from non-federal sources or that have been exempted from such contributions through the local negotiating process.
2. Grantees that use federal grant funds for PA CareerLink® infrastructure costs as a mandated partner but do not provide classes at the PA CareerLink® site.
3. Grantees that use federal grant funds for PA CareerLink® infrastructure costs as a mandated partner and provide classes at the PA CareerLink® site, but pay little or no additional amount for the classroom space. This is often the case when PA CareerLink® costs are assigned on a full-time equivalent cost basis, and the adult education program has staff members at the PA CareerLink® full time.
4. Grantees that use federal grant funds for PA CareerLink® infrastructure costs, provide classes at the PA CareerLink® site, and pay an additional amount for the classroom space above and beyond what they would pay if they were a partner but not providing classes on site.

## **AE2.3 Administrative costs in excess of 5 percent with no indirect costs**

The Division of Adult Education will consider requests to negotiate administrative costs in excess of 5 percent when all proposed costs are direct administrative costs as defined in section 607.6 of these guidelines. See AE2.5 for instructions on how to submit a request to negotiate.

## **AE2.4 Administrative costs in excess of 5 percent with indirect costs**

For agencies with approved restricted indirect costs rates, the Division of Adult Education will handle administrative costs as follows:

1. The Division of Adult Education will not consider requests to negotiate administrative costs in excess of 5 percent solely to allow for indirect costs.
2. Grantees that do not use any federal grant funds for PA CareerLink® infrastructure costs may charge indirect costs to the grant up to the point that the total administrative costs (i.e., direct administrative costs plus indirect costs) equal 5 percent of the grant. The Division of Adult Education will not consider requests to negotiate administrative costs to allow for additional indirect costs.

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3. Grantees that use federal grant funds for PA CareerLink® infrastructure costs and either do not provide classes at the PA CareerLink® site or pay no additional costs for classroom space at the PA CareerLink® site may charge indirect costs to the grant up to the point that the total administrative costs (i.e., direct administrative costs, including PA CareerLink® infrastructure costs, plus indirect costs) equals 5 percent of the grant.
  - a. If a grantee's PA CareerLink® infrastructure contributions paid from the federal grant are high because the program has adult education staff whose worksite is the PA CareerLink® and FTE is used as the cost basis, the division will consider a request to negotiate an adequate level of funding for administrative purposes to address the high infrastructure contributions. See AE2.5 for instructions on how to submit a request to negotiate.
4. Grantees that use federal grant funds for PA CareerLink® infrastructure costs, offer classes at the PA CareerLink® site, and pay an additional amount for the classroom space may charge indirect costs to the grant up to the point that the total administrative costs (i.e., direct administrative costs, including PA CareerLink® infrastructure costs, plus indirect costs) equals 5 percent of the grant.
  - a. The division will consider a request to negotiate an adequate level of funding to address the additional costs for classroom space. See AE2.5 for instructions on how to submit a request to negotiate.

### **AE2.5 Process to request to negotiate administrative costs in excess of 5 percent**

All requests must be submitted to the Division of Adult Education via email and must include detailed supporting documentation that provides supportable evidence for the assertion that the 5 percent cap is too restrictive to allow for adequate administration of the adult basic education program and an explanation of why the additional administrative costs are essential to the success of the adult basic education program.

Send an email to your advisor with the following information:

1. Salary and benefits costs allocated to Function Code 2300 broken out by staff member;
2. Other direct costs allocated to Function Code 2300, totaled by object code series, with a brief description of the charges; and
3. PA CareerLink® infrastructure costs associated with being a partner at each PA CareerLink® site. In cases in which the grantee is paying an additional amount for classroom space, that amount should be listed separately (see #7 below).
4. Total of items 1-3 charged to FC 2300 and the percentage of the grant it is.
5. If applicable, the requested indirect costs, along with the agency's approved restricted indirect cost rate.
6. Total of 4 and 5. The total of 4 and 5 may not exceed 5 percent of the grant.
7. Shared PA CareerLink® personnel costs (e.g., for a receptionist, support staff, or the site operator), if applicable.
8. The infrastructure costs associated with the classroom space at the PA CareerLink® site, broken out by site, if applicable.
9. Total of FC 2300 + 5000 indirect costs and the percentage of the grant amount.

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| Object Codes   | Function Codes              |                     |   |   |                                     |  |                                 |  |                                 |
|--|-----------------------------|---------------------|---|---|-------------------------------------|--|---------------------------------|--|---------------------------------|
| The dark/shaded cells indicate an unallowable FC/OC match. White cells indicate an allowable FC/OC match | 1691 Instructional Services | 1692 Tutor Training | 2122 Counseling Services (Transitional Support) | 2160 Social Work Services (Barrier Support) | 2200 Support Staff Services (IHPDS) | 2300 Support Services (Administration) | 2600 Operations and Maintenance | 2900 Other Support Services (Student Recruitment & Data Entry) | Local Match Federal Grants Only |
| 101 Supervisors/Coordinators (Adult Education Program)   |                             |                     |   |   |                                     |  |                                 |  |                                 |
| 102 Instructors (Adult Education)  |                             |                     |   |   |                                     |  |                                 |  |                                 |
| 103 Counselors (Barrier and Transition Support Staff)  |                             |                     |   |   |                                     |  |                                 |  |                                 |
| 104 Tutor Trainers (Tutor Coordinator)   |                             | STATE ONLY          |   |   |                                     |  |                                 |  |                                 |
| 105 Admin Support Personnel  |                             |                     |   |   |                                     |  |                                 |  |                                 |
| 106 Adult Ed Other (Only Tutors/Classroom Volunteers for Federal Local Match)                            |                             |                     |   |   |                                     |  |                                 |  |                                 |
| 107 Early Childhood Instructors: Family Literacy Programs Only   |                             |                     |   |   |                                     |  |                                 |  |                                 |
| 108 Parenting Instructors: Family Literacy Programs Only   |                             |                     |   |   |                                     |  |                                 |  |                                 |
| 109 PACT (PACT and ILA Instructors: Family Literacy Programs Only)                                       |                             |                     |   |   |                                     |  |                                 |  |                                 |
| 110 Official/Administrative  |                             |                     |   |   |                                     |  |                                 |  |                                 |
| 116 Employee Insurance Opt Out   |                             |                     |   |   |                                     |  |                                 |  |                                 |
| 190 Instructional Assistants (Childcare or Babysitting Staff only)                                       |                             |                     |   |   |                                     |  |                                 |  |                                 |
| 210 Group Insurance (Medical, Dental and Vision, etc.)   |                             |                     |   |   |                                     |  |                                 |  |                                 |
| 220 FICA (Social Security Contributions)   |                             |                     |   |   |                                     |  |                                 |  |                                 |
| 230 Retirement   |                             |                     |   |   |                                     |  |                                 |  |                                 |
| 231 Other Benefits   |                             |                     |   |   |                                     |  |                                 |  |                                 |
| 250 Unemployment Compensation  |                             |                     |   |   |                                     |  |                                 |  |                                 |
| 260 Workers' Compensation  |                             |                     |   |   |                                     |  |                                 |  |                                 |

| Object Codes   | Function Codes              |                     |   |   |                                     |  |                                 |  |                                 |
|--|-----------------------------|---------------------|---|---|-------------------------------------|--|---------------------------------|--|---------------------------------|
|  | 1691 Instructional Services | 1692 Tutor Training | 2122 Counseling Services (Transitional Support) | 2160 Social Work Services (Barrier Support) | 2200 Support Staff Services (IHPDS) | 2300 Support Services (Administration) | 2600 Operations and Maintenance | 2900 Other Support Services (Student Recruitment & Data Entry) | Local Match Federal Grants Only |
| The dark/shaded cells indicate an unallowable FC/OC match. White cells indicate an allowable FC/OC match |                             |                     |   |   |                                     |  |                                 |  |                                 |
| <b>320 Professional Services (Purchased/Contracted Educational Services )</b>                            |                             |                     |   |   |                                     |  |                                 |  |                                 |
| <b>330 Other Professional Services (Purchased/Contracted Professional Services)</b>                      |                             |                     |   |   |                                     |  |                                 |  |                                 |
| <b>340 Technical Services (Purchased/Contracted Technology Services)</b>                                 |                             |                     |   |   |                                     |  |                                 |  |                                 |
| <b>350 Security/Safety Services (Purchased/Contracted)</b>   |                             |                     |   |   |                                     |  |                                 |  |                                 |
| <b>360 Employee Training and Development Services (Purchased/Contracted)</b>                             |                             | OTP Only            |   |   |                                     |  |                                 |  |                                 |
| <b>390 Other Purchased Professional and Technical Services (CareerLink Infrastructure Expenses only)</b> |                             |                     |   |   |                                     | Federal Only                           | State Only                      |  |                                 |
| <b>410 Cleaning</b>  |                             |                     |   |   |                                     |  |                                 |  |                                 |
| <b>420 Utilities</b>   |                             |                     |   |   |                                     |  |                                 |  |                                 |
| <b>430 Repairs and Maintenance (Purchased/Contracted)</b>  |                             |                     |   |   |                                     |  |                                 |  |                                 |
| <b>441 Space Rental (Classrooms/Offices)</b>   |                             |                     |   |   |                                     |  |                                 |  |                                 |
| <b>442 Equipment Rental</b>  |                             |                     |   |   |                                     |  |                                 |  |                                 |
| <b>448 Lease/Rental of Hardware and Related Technology Services</b>                                      |                             |                     |   |   |                                     |  |                                 |  |                                 |
| <b>449 Equipment Usage (Log)</b>   |                             |                     |   |   |                                     |  |                                 |  |                                 |
| <b>490 Other Purchased Property Services</b>   |                             |                     |   |   |                                     |  |                                 |  |                                 |
| <b>520 Insurance (Purchased Fire, Property and Liability)</b>  |                             |                     |   |   |                                     |  |                                 |  |                                 |
| <b>530 Communications</b>  |                             |                     |   |   |                                     |  |                                 |  |                                 |
| <b>540 Advertising</b>   |                             |                     |   |   |                                     |  |                                 |  |                                 |
| <b>550 Printing and Binding</b>  |                             |                     |   |   |                                     |  |                                 |  |                                 |
| <b>580 Travel</b>  |                             |                     |   |   |                                     |  |                                 |  |                                 |

| Object Codes   | Function Codes              |                     |   |   |                                     |   |                                 |  |                                 |
|--|-----------------------------|---------------------|---|---|-------------------------------------|---|---------------------------------|--|---------------------------------|
| The dark/shaded cells indicate an unallowable FC/OC match. White cells indicate an allowable FC/OC match   | 1691 Instructional Services | 1692 Tutor Training | 2122 Counseling Services (Transitional Support) | 2160 Social Work Services (Barrier Support) | 2200 Support Staff Services (IHPDS) | 2300 Support Services (Administrati on) | 2600 Operations and Maintenance | 2900 Other Support Services (Student Recruitment & Data Entry) | Local Match Federal Grants Only |
| <b>610 Office Supplies (Classroom, Office and Building)</b>  |                             |                     |   |   |                                     |   |                                 |  |                                 |
| <b>640 Texts (Books and Periodical for Instruction/Professional Development)</b>                           |                             |                     |   |   |                                     |   |                                 |  |                                 |
| <b>650 Supplies and Fees for Technology</b>  |                             |                     |   |   |                                     |   |                                 |  |                                 |
| <b>790 Equipment (with life beyond the fiscal period)</b>  |                             |                     |   |   |                                     |   |                                 |  |                                 |
| <b>810 Dues and Fees (PAACE and COABE and conference registration fees)</b>                                |                             |                     |   |   |                                     |   |                                 |  |                                 |
| <b>891 Other Miscellaneous Expenditures (Unused Portion of Approved Restricted Indirect Cost Expenses)</b> |                             |                     |   |   |                                     |   |                                 |  |                                 |
| <b>900 Restricted Indirect Cost Rate only in Function Code 5000</b>  |                             |                     |   |   |                                     |   |                                 |  |                                 |