

TEXAS WORKFORCE COMMISSION
Adult Education and Literacy Letter

ID/No:	AEL 02-23
Date:	March 8, 2023
Keyword:	AEL
Effective:	July 1, 2023

To: Adult Education and Literacy Grant Recipients
Adult Education and Literacy Special Project Grant Recipients
Local Workforce Development Board Executive Directors
Commission Executive Offices
Integrated Service Area Managers



From: Courtney Arbour, Director, Workforce Development Division

Subject: **Reporting Adult Education and Literacy Career Services and Training Services**

PURPOSE:

The purpose of the AEL Letter is to provide Adult Education and Literacy (AEL) grant recipients¹ with information and guidance on how to report career services and training services according to the most recent guidance from the Office of Career Technical and Adult Education (OCTAE) in [OCTAE Program Memo \(PM\) 17-2](#), issued September 15, 2022, and titled “Performance Accountability Guidance for Workforce Innovation and Opportunity Act (WIOA) Core Programs.”

RESCISSIONS:

None

BACKGROUND:

On September 15, 2022, OCTAE released a revision to OCTAE PM 17-2 (originally published August 23, 2017) which outlines how “WIOA §116 establishes performance accountability indicators and performance reporting requirements to assess the effectiveness of states and local areas in achieving positive outcomes for individuals served by the workforce development system’s six core programs.” The guidance identifies differences between career services and training services, describes how states must classify and report each service, and includes a cost calculation for each category.

WIOA requires that states determine costs for career services and training services separately. Additionally, WIOA defines “administrative costs” separately from the

¹ For the purposes of this AEL Letter, AEL grant recipients are entities that receive AEL funds through the Texas Workforce Commission (TWC).

definitions of “career services” and “training services.” Therefore, states must not include administrative costs when reporting costs for career services and costs for training services.

This AEL Letter outlines how AEL grant recipients report career services and training services in both the Texas Educating Adults Management System (TEAMS) and the Cash Draw Expenditure Reporting (CDER) system. In Program Year 2022–2023, AEL is conducting a pilot rollout for reporting costs associated with career services. In January 2023, it added the Supplemental reporting field in the CDER system for expenditure reporting in order to collect data and test the reporting process. As of July 1, 2023, budgets will be adjusted, a direct cost category will be added to the CDER system, and expenditures for career services will be monitored closely to ensure proper reporting.

PROCEDURES:

No Local Flexibility (NLF): This rating indicates that AEL entities must comply with the federal and state laws, rules, policies, and required procedures set forth in this AEL Letter and have no local flexibility in determining whether and/or how to comply. All information with an NLF rating is indicated by “must.”

Local Flexibility (LF): This rating indicates that AEL entities have local flexibility in determining whether and/or how to implement guidance or recommended practices set forth in this AEL Letter. All information with an LF rating is indicated by “may” or “recommend.”

TEAMS Reporting

NLF: AEL grant recipients must record in TEAMS each instance of a career service or training service provided to a participant every time a service occurs, as based on the data entry schedule outlined in their grants.

NLF: To report training services in TEAMS, AEL grant recipients must continue to follow the guidance in [AEL Letter 03-17](#), issued August 11, 2017, and titled “Implementing and Reporting Workforce Training under the Integrated Education and Training Approach to Service Delivery.”

NLF: Boards must be aware that, as outlined in OCTAE PM 17-2, career services include the following:

- Outreach, intake, and orientation information
- Initial assessment of skill levels including literacy, numeracy, and English language proficiency, as well as aptitudes, abilities, and support services needs
- Referrals to and coordination of activities with other programs and services
- Provision of performance information and program cost information on eligible providers of education, training, and workforce services by program and type of provider
- Provision of information on availability of support services or assistance and appropriate referrals (including child care, child support, medical or child health assistance available through the state’s Medicaid program and Children’s Health Insurance Program (CHIP), Supplemental Nutrition Assistance Program (SNAP))

benefits, Earned Income Tax Credit (EITC), assistance under Temporary Assistance for Needy Families (TANF), and other support services and transportation)

NLF: AEL grant recipients must be aware that not all career services costs are attributed to interactions with individual students. Costs may be incurred when providing career services to support the overall program, such as outsourced printing costs for orientation brochures or production costs for outreach videos.

CDER System Reporting

NLF: When reporting costs in the CDER system, AEL grant recipients must follow the guidance in [AEL Letter 01-23](#), issued February 14, 2023, and titled “Cash Draw and Expenditure Reporting System Instructions for Adult Education and Literacy Grant Awards,” and any subsequent issuances.

NLF: AEL grant recipients must update local policies to comply with proper reporting of career services and training services.

LF: AEL grant recipients must be aware that a Supplemental item has been added to the CDER system for reporting career services until June 30, 2023. AEL grant recipients are encouraged to use the Supplemental category to report career services through June 2023, thereby allowing time to develop local policies and procedures related to the fiscal reporting of costs associated with career services and training services.

NLF: AEL grant recipients must begin reporting career services and training services direct costs on July 1, 2023.

NLF: As outlined in AEL Letter 01-23, AEL grant recipients must report costs associated with career services, which may include the following:

- Salary, wages, and fringe benefits for time that provider staff spends providing career services directly to Adult Education and Family Literacy Act (AEFLA) program participants (and, where applicable, to prospective AEFLA participants), such as conducting outreach, conducting intake, holding orientation sessions, administering or proctoring tests used to perform an initial assessment of skill levels, identifying AEFLA participants’ support services needs during initial intake and as needs arise during participation, providing information on the availability of support services, completing referral forms or contacting other entities to make referrals for support services (as appropriate), and providing performance information and program cost information
- A portion of salary, wages, and fringe benefits for provider staff that supervises the aforementioned personnel
- Outsourced printing costs incurred for the provision of career services (such as brochures or other outreach handouts, intake or referral forms, performance and program cost information, and information about support services)
- Costs of tests used in performing an initial assessment of skill levels and associated external proctoring fees (if any)

- Booth fees, banners (for program identification), and local travel costs (such as mileage reimbursement) incurred for staff to be present at local job fairs or other appropriate events for local outreach for the program
- Billboard, newspaper, television, and radio announcements for program outreach (if necessary, reasonable, and not available as a free-of-charge public service announcement)
- Production costs to develop online videos or webinars used solely for program outreach or for orientation or other AEFLA career services

NLF: As also outlined in AEL Letter 01-23, AEL grant recipients must exclude certain costs from career services expenditures, including the following:

- Workforce preparation activities, English language acquisition programs, and any other WIOA-defined career services not listed in OCTAE PM 17-2
- Identifying support services providers with which the AEFLA program does not have an existing/established relationship; contacting those support services providers to introduce the AEFLA program and to establish points of contact and referral mechanisms; developing memorandums of understanding with those support services providers, if needed; and incurring local travel costs (such as mileage reimbursement) to meet with those support services providers, if necessary
- The AEFLA program's allocable share of any portion of shared infrastructure costs owed under WIOA §121 (under AEFLA these costs are AEFLA administrative costs) and any other AEFLA administrative costs
- Portions of a provider's own space, equipment, supplies, and software costs used in the delivery of career services (not shared American Job Center costs), such as:
 - rent for space leased by a provider where provider staff delivers career services or a mix of career services and other AEFLA services;
 - depreciation for space owned by a provider where provider staff delivers career services or a mix of career services and other AEFLA services;
 - utilities, phone, and internet costs incurred by a provider at a provider location where provider staff delivers career services or a mix of career services and other AEFLA services;
 - general office supplies (such as folders, writing utensils, staplers and staples, writing tablets, sticky notes, tape, and so on) purchased by a provider for use by provider staff in the delivery of career services or a mix of career services and other AEFLA services;
 - computers purchased or leased by an AEFLA provider (and associated software, computer repair, and computer support costs) to enable provider staff to deliver career services or a mix of career services and other AEFLA services;
 - printers or copiers purchased or leased by an AEFLA provider (and associated costs for copy paper, toner, and support or repair) to enable provider staff to deliver career services or a mix of career services and other AEFLA services; and
 - software licenses used to conduct remote meetings with AEFLA program participants (such as for orientation or other purposes).

INQUIRIES:

Send inquiries regarding this AEL Letter to AELpolicy.clarifications@twc.texas.gov.

ATTACHMENTS:

None

REFERENCES:

OCTAE Program Memorandum 17-2, issued September 15, 2022, and titled
“Performance Accountability Guidance for Workforce Innovation and Opportunity
Act (WIOA) Core Programs”

AEL Letter 01-23, issued February 14, 2023, and titled “Cash Draw and Expenditure
Reporting System Instructions for Adult Education and Literacy Grant Awards”

AEL Letter 03-17, issued August 11, 2017, and titled “Implementing and Reporting
Workforce Training under the Integrated Education and Training Approach to Service
Delivery”