

**TEXAS WORKFORCE COMMISSION**  
**Adult Education and Literacy Letter**

<b>ID/No:</b>	AEL 03-17
<b>Date:</b>	August 11, 2017
<b>Keywords:</b>	AEL; Fiscal Administration; WIOA
<b>Effective:</b>	Immediately

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

**From:**  Courtney Arbour, Director, Workforce Development Division

**Subject:** **Implementing and Reporting Workforce Training under the Integrated Education and Training Approach to Service Delivery**

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**PURPOSE:**

To provide Adult Education and Literacy (AEL) grantees<sup>1</sup> with information and guidance on implementing Workforce Training as part of the Integrated Education and Training<sup>2</sup> (IET) approach to service delivery.

This AEL Letter:

- defines “Workforce Training”;
- explains related costs;
- identifies funding options available; and
- describes the requirements for documentation and reporting.

**BACKGROUND:**

The Workforce Innovation and Opportunity Act (WIOA) strategically positions AEL to play an integral role within a broader interconnected workforce development system and greatly expands the service-delivery options available to providers.

The inclusion of Workforce Training under the IET approach to service delivery provides AEL providers with a critical tool to support students in increasing

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<sup>1</sup> For the purposes of this AEL Letter, AEL grantees are entities that receive AEL funds from the Texas Workforce Commission.

<sup>2</sup> Certain terms are capitalized to indicate that they are defined either in this AEL Letter or in the documents listed under References.

employment outcomes, postsecondary education and training transition and completion, skills gains, and high school equivalency completion.

**PROCEDURES:**

**No Local Flexibility (NLF):** This rating indicates that AEL grantees 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” or “shall.”

**Local Flexibility (LF):** This rating indicates that AEL grantees 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.”

**NLF:** AEL grantees must be aware of the following definitions:

**Core Components of IET (IET Components)**

The required core components of an IET approach are:

- AEL activities contextualized for Workforce Training;
- Workforce Preparation Activities; and
- Workforce Training for a specific emerging or existing in-demand or targeted occupation or occupational cluster, as determined by the Local Workforce Development Board (Board).

**Direct Contact Hour**

A direct contact hour is a contact hour that consists of instruction or instructional activity in reading, writing, mathematics, and English as a second language (ESL), which includes classroom instruction, tutoring, or participation in a learning lab. Hours accumulated through Orientation or Workforce Training do not count as direct contact hours. Hours accumulated through Workforce Preparation Activities count as direct contact hours only when the activities are delivered in the context of reading, writing, mathematics, and ESL. Direct contact hours are entered on the daily class contact hour page in the Texas Educating Adults Management System (TEAMS).

**Integrated Education and Training**

IET means an overall scope of services designed for a specific emerging or existing occupation or occupational cluster to further participants’ education and advancing in their careers. The three required IET Components, delivered through Integrated Services, ensure that participants develop the skills to succeed in the Workforce Training program by attaining a Recognized Postsecondary Credential, entering or advancing in employment, or advancing in postsecondary education and training.

**Integrated Services**

Integrated Services (Integrated) means that IET Components are provided concurrently and contextually. That is, IET Components:

- are provided simultaneously at points within the overall scope of the program;

- are of sufficient intensity and quality and are based on the most rigorous research available to support the advancement of education and career development; and
- use occupationally relevant instructional materials.

Integrated Services also means that an IET program has program activities organized to function cooperatively so that specific adult education content, Workforce Preparation Activities, and Workforce Training competencies are aligned to a single set of learning objectives that identify specific competencies across the IET Components. The competencies may include established learning objectives and/or trade-related benchmarks or competencies for a particular emerging or existing in-demand or targeted occupation or occupational cluster required for attaining a recognized postsecondary credential.

### **Texas Workforce System**

The Texas Workforce Partners are as follows:

- WIOA programs for adults, dislocated workers, and youth
- The Wagner-Peyser Employment Service program
- AEL programs
- Vocational Rehabilitation programs under WIOA Title IV
- Unemployment Insurance program
- The Trade Adjustment Assistance program
- The Choices program (the employment and training component of the Temporary Assistance for Needy Families program)
- The Supplemental Nutrition Assistance Program Employment and Training program
- Subsidized child care
- Apprenticeship programs (Texas Education Code, Chapter 133)
- The National and Community Services Act program
- The Senior Community Service Employment Program
- Non-Certificate Postsecondary Career and Technology Training programs

Workforce Partners in Texas differ from those listed in WIOA because Texas is allowed to operate certain aspects of WIOA under prior consistent state law.

### **Supportive Services**

Supportive Services include providing the transportation, child care, dependent care, housing, and needs-related payments necessary to enable an individual to participate in AEL activities.

**Workforce Training** means the following:

- On-the-Job Training, as described in WIOA §3(44)
- Skills upgrading, for example, training delivered in an IET by an employer
- Entrepreneurial training
- Customized training, as described in WIOA §3(14)
- Other occupational skills training, for example, training delivered in an IET by a community or technical college
- Prerequisite training

- Registered Apprenticeship training
- Youth occupational skills training

**NLF:** AEL grantees must be aware AEL allocations provide for increased funding to support the implementation of the IET service approach, including the provision of Workforce Training when provided through Integrated Services.

**LF:** AEL grantees may fund Workforce Training from all AEL funding sources, subject to compliance with applicable eligibility guidelines.

**LF:** AEL grantees have flexibility in finding optimal efficiency in leveraging available additional resources to the development and provision of IET programs. Whenever possible, AEL grantees may leverage funds from other appropriate resources, such as using effective coenrollment strategies with Workforce Partners or other appropriate resources such as federal Pell grants, and local funding, to maximize overall efficiency and support for student success in achieving Recognized Postsecondary Credentials and career advancement.

**LF:** AEL funds may be used to pay for costs related to Workforce Training. Related costs help students pay for:

- uniforms or other required training attire and training-related tools, including eyeglasses and protective eye gear;
- books, fees, school supplies, and other necessary items for students enrolled in Workforce Training; and
- employment and training-related applications, tests, and certifications.

**NLF:** AEL funds must not be used to pay for Supportive Services. AEL grantees must collaborate with other Texas Workforce Partners and other entities to support access to appropriate Supportive Services.

**NLF:** AEL grantees must enter all Workforce Training hours associated with IET in TEAMS, including Workforce Training that is supported by leveraged funds from other appropriate resources. Workforce Training hours do not count as direct contact hours for use in circumstances such as pre- and post-testing for Measurable Skill Gains.

**NLF:** For those Workforce Training instructors whose salaries are funded with AEFLA funds, AEL grantees must enter the training instructor information into TEAMS for each training class that is part of IET.

**NLF:** AEL grantees must enter the basic skills instructor information into TEAMS for each training class that is part of IET, when the training instructor information is not available for TEAMS use.

**LF:** AEL grantees may enter Workforce Training instructor information for those training instructors not paid with AEFLA funds, or grantees may enter the basic skills instructor information for those training classes in TEAMS.

**NLF:** AEL grantees must document daily student attendance in Workforce Training to ensure that students obtain the intensity of services needed to support

advancement and completion of common learning objectives. Examples of adequate documentation include:

- a paper or electronic class roll indicating daily attendance;
- a daily sign-in sheet;
- a weekly attendance verification signed by the Workforce Training instructor;
- an official completion certificate issued by the Workforce Training provider or credentialing agency that lists the total contact hours completed by the student; and
- other forms of daily attendance verification approved by TWC AEL staff.

**NLF**: AEL grantees must add the following training details in TEAMS 3.0, in accordance with WIOA requirements:

- Name of the training provider or eligible training provider
- Dates that the participant entered/exited training
- Type of training
- Program of study
- Classification of Instructional Programs (CIP) code
- Occupational Skills Training code
- Date that the participant completed or withdrew from the training

**NLF**: AEL grantees must report AEL-funded Workforce Training expenditures by funding source as part of the monthly expenditure reports submitted through the Texas Workforce Commission's (TWC) Cash Draw and Expenditure Reporting (CDER) system.

**NLF**: AEL grantees must provide students with a program syllabus for IET programs.

**NLF**: AEL grantees must submit plans that describe how Workforce Training uses the IET approach to service delivery (including Integrated EL Civics). Grantees must submit the plans to TWC through the Career Pathways Implementation Plan portal at <http://www-tcall.tamu.edu/twcael/grantees.htm>.

#### **INQUIRIES:**

Send inquiries regarding this AEL Letter to [aelpolicy.clarifications@twc.state.tx.us](mailto:aelpolicy.clarifications@twc.state.tx.us).

#### **REFERENCES:**

Workforce Innovation and Opportunity Act of 2014, including Title II, the Adult Education and Family Literacy Act (<https://www.gpo.gov/fdsys/pkg/PLAW-113publ128/pdf/PLAW-113publ128.pdf>)

Adult Education and Family Literacy Act regulations (<https://www.federalregister.gov/documents/2016/08/19/2016-16049/programs-and-activities-authorized-by-the-adult-education-and-family-literacy-act-title-ii-of-the>)

AEL Letter 02-16, “Implementing the Integrated Education and Training Service Approach,” issued March 23, 2016, and any subsequent issuances (<http://www.twc.state.tx.us/partners/workforce-policy-guidance#abe>)