TEXAS WORKFORCE COMMISSION
Adult Education and Literacy Letter

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Date:	January 29, 2019
Keyword:	AEL; WIOA
Effective:	Immediately

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

From: Courtney Arbour, Director, Workforce Development Division

Subject: **Periods of Participation for Adult Education and Literacy**

PURPOSE:

The purpose of this AEL Letter is to provide Adult Education and Literacy (AEL) grantees[1] with information and guidance on periods of participation (POPs) under the Workforce Innovation and Opportunity Act (WIOA).

This AEL Letter describes the following:
- The start and end of a POP
- The relationship between POPs and program years
- How POPs impact eligibility, progress testing, program exit, planned gaps
- How multiple POPs in and across program years affect performance calculations
- How POPs impact measurable skill gains (MSGs) and exit-based measure calculations
- How workforce training in Integrated Education and Training (IET) programs and other participatory services can extend a POP
- Ending a planned gap with a participatory service
- Month-to-month planned gap entry

BACKGROUND:

Section 116 of WIOA establishes performance accountability measures and performance reporting requirements to assess the effectiveness of the six core WIOA programs[2] in

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[1] For the purposes of this AEL Letter, AEL grantees are entities that are Texas Workforce Commission (TWC) grantees funded with AEL funds.

[2] The six core programs are the adult, dislocated worker, and youth programs, authorized under WIOA Title I and administered by the US Department of Labor (DOL); the Adult Education and Family Literacy Act (AEFLA) program, authorized under WIOA Title II and administered by the US Department of Education (ED); the Employment Service program authorized under the Wagner-Peyser Act, as amended by WIOA Title III and administered by DOL; and the Vocational Rehabilitation program authorized under Title I of the Rehabilitation Act of 1973, as amended by WIOA Title IV and administered by ED.

achieving positive workforce and educational results. WIOA supports the alignment of performance-related definitions and indicators, including the use of POPs.

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" or "shall."

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."

Definitions

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

Exit means the last day that a participant receives a participatory service. This date cannot be determined until 90 days after the participant last received a participatory service, unless those 90-days are part of a planned gap. After 90 days of inactivity, exit is retroactively calculated to the last day of participatory service. The Texas Educating Adults Management System (TEAMS) automatically calculates exit. AEL grantees cannot initiate exit by separating a participant.

Participatory service is an activity or service that extends a POP after an individual becomes eligible for AEL services. A participatory service begins a POP after a participant is found eligible by taking a pretest and accruing 12 direct-contact hours.

After eligibility is determined, the following services are considered participatory services:
- Testing (excluding official high school equivalency tests)
- Direct-contact or proxy contact hours
- Workforce training hours in isolation up to 60 days after the end of accruing direct-contact or proxy contact hours, as described in AEL Letter 01-18, Change 1, issued September 7, 2018, and entitled, "Educational Outcomes in Adult Education and Literacy—*Update*," and subsequent issuances

Performance measures include state and federal measures. Certain measures are also referred to as post-exit or exit-based measures and are calculated only after a participant exits.

The six federal WIOA indicators of performance are the following:
1. MSGs
2. Employment Rate—Employed 2nd quarter (Q2) post-exit
3. Employment Rate— Employed 4th quarter (Q4) post-exit

4. Median Earnings 2nd quarter (Q2) post-exit
5. Credential Attainment post-exit
6. Effectiveness in Serving Employers, comprising the following three sub-measures (components), one of which is post-exit:
   - Component 1: Employed with the same employer in Q2 and Q4 post-exit
   - Component 2: Repeat Business Customers
   - Component 3: Employer Penetration Rate

The two state measures are the following:
1. Employed or Enrolled in Education Q2 post-exit
2. Employed or Enrolled in Education Q2–Q4 post-exit

Period of Participation (POP) is an interval of measurement that begins each time an individual is found eligible for the AEL program through a pretest and accrues 12 direct-contact hours and ends each time an individual has not received a participatory service for 90 days. POPs can span across program years, and a participant can have multiple POPs in one program year. POPs add an additional period of measurement that is used to calculate participation, contact hours, testing intervals, and exit-based performance measure calculations within and across program years.

Planned gap is a break in service with a specific date on which the participant will return for specific services. A planned gap is more than 90 days but fewer than 180 days. A participant who has an active planned gap entered into TEAMS will not exit after 90 days, unless the participant fails to return to services by the end of the planned gap. Examples of instances that may require a planned gap include the following:
- A participant has a medical procedure that requires the participant to be out of class for a certain period of time, but the participant expects to return to class on a particular date.
- A participant must leave class to care for a family member but will return to class on a particular date.
- In May, a participant registers for an IET that begins the next fall, but needs to work full time over the summer and cannot continue AEL services.

If a participatory service does not occur within 14 days of the last day of a planned gap and 90 or more days have passed since the last participatory service, an exit will be calculated as of the date of the individual's last participatory service.

POP Tracking and Data Entry
NLF: AEL grantees must be aware that the following data entry codes are used to calculate POPs:
- "D," or direct-contact hours, as entered on the *Monthly Contact Hours* screen in TEAMS
- "P," or proxy hours, as entered on the *Monthly Contact Hours* screen in TEAMS for classes that contain distance learning

- "T," or training hours, for IET, as entered on the *Monthly Contact Hours* screen in TEAMS for classes that contain training services
- Tests, as entered on the *Assessments* screen in TEAMS

When a POP Begins and Ends

<u>**NLF:**</u> AEL grantees must be aware that the duration of a POP is not affected by the program year. Because the calculation of a POP is independent of the program year, the participant's enrollment, contact hours, and pre- or posttesting status within a POP can span across program years and continue until the participant exits, not necessarily when a program year ends.

A POP begins on the day an individual accrues 12 direct-contact hours after becoming eligible for AEL services based on a pretest score. Direct-contact hours are documented by "D" in TEAMS.

A POP ends after 90 days without a participatory service, when the inactivity triggers exit. The exit date is the day of the participant's last participatory service.

<u>**NLF:**</u> AEL grantees must be aware that a provider cannot manually begin or end a POP in TEAMS. TEAMS calculates the beginning of a POP after a participant is found eligible through a test and has accrued 12 direct-contact hours, and calculates the POP ending when 90 days have passed and a participant who is not in a planned gap has had no participatory service, which triggers exit. Additionally, if a participant ends service with one provider and begins with another within 90 days of the date of the last participatory service by the first provider, the POP will continue and the new provider will be accountable for the participant's performance.

Reestablishing Participant Status

<u>**NLF:**</u> AEL grantees must be aware that if a participant exits, a new test is required to establish eligibility and the individual also must accrue another 12 direct-contact hours to regain participant status.

**Multiple POPs in and across Program Years**

<u>**NLF**</u>: AEL grantees must be aware that a POP represents a period of measurement independent of the program year. While the program year is an annual measurement that begins July 1 and ends June 30 of the next calendar year, POPs can occur within and across program years, and a participant can have multiple POPs within a program year and across program years. (See Figures 1a and 1b.)

Figure 1a: A participant with multiple POPs in a program year
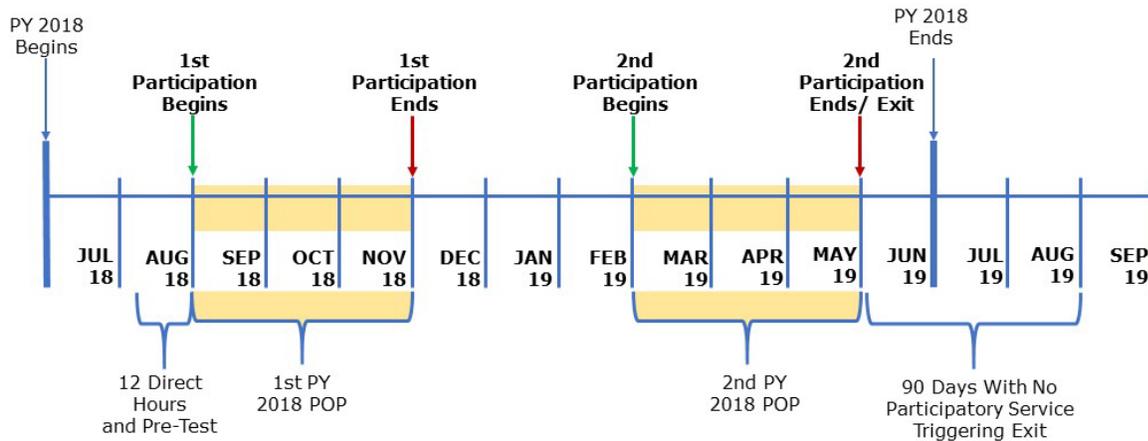
NLF: AEL grantees must be aware that when a POP spans across a program year, participant contact hours carry forward into the next program year and it is not necessary to retest a participant at the start of a program year to establish an annual pretest or baseline test score.

Figure 1b: Carrying hours forward for a participant with a POP that spans across a program year
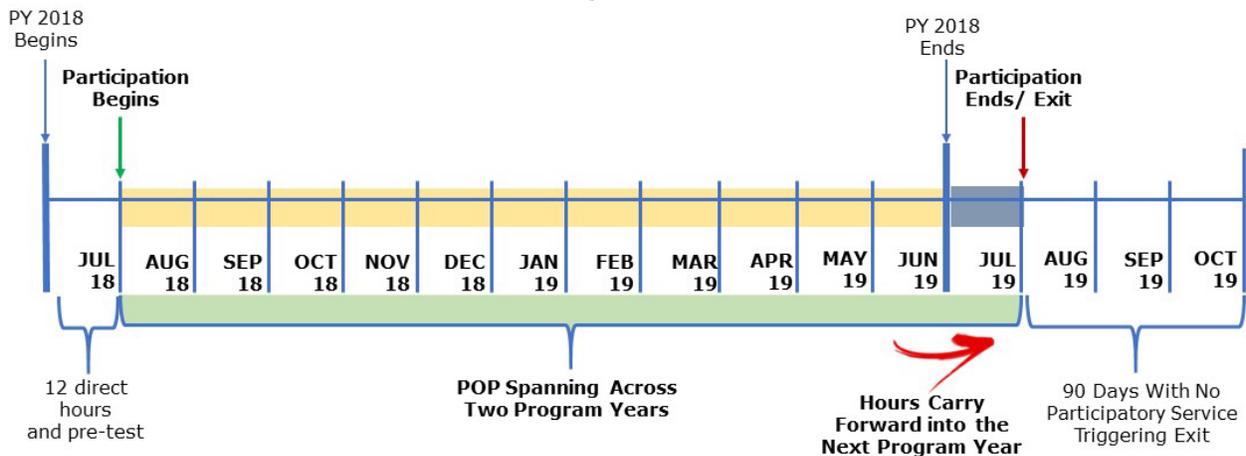
POPs, Program Year, and Performance Calculations

NLF: AEL grantees must be aware that exit-based measures are calculated each time a participant exits a POP, while the MSG measure is calculated for each participant once each program year.

POPs and MSGs

NLF: AEL grantees must be aware that participants are in the denominator for MSG for each program year in which they are participants and grantees are accountable for one MSG

gain each program year, even when a participant has more than one POP during that year. If a participant's POP spans across program years, for example Program Year 2018 (PY'18) and PY'19, the participant is counted separately in the MSG denominator indicator for each program year. (See Figure 2.)

NLF: AEL grantees must ensure that the achievement of an MSG is entered into TEAMS as soon as the participant earns the MSG and that the provider has documentation, if required for the MSG, of the achievement, in accordance with AEL Letter 01-18, Change 1, and subsequent issuances. If a participant achieves more than one MSG in a program year, the provider must enter each MSG into TEAMS and maintain any required documentation, as applicable.

*Figure 2: Participant in two program years with one POP and two MSGs*
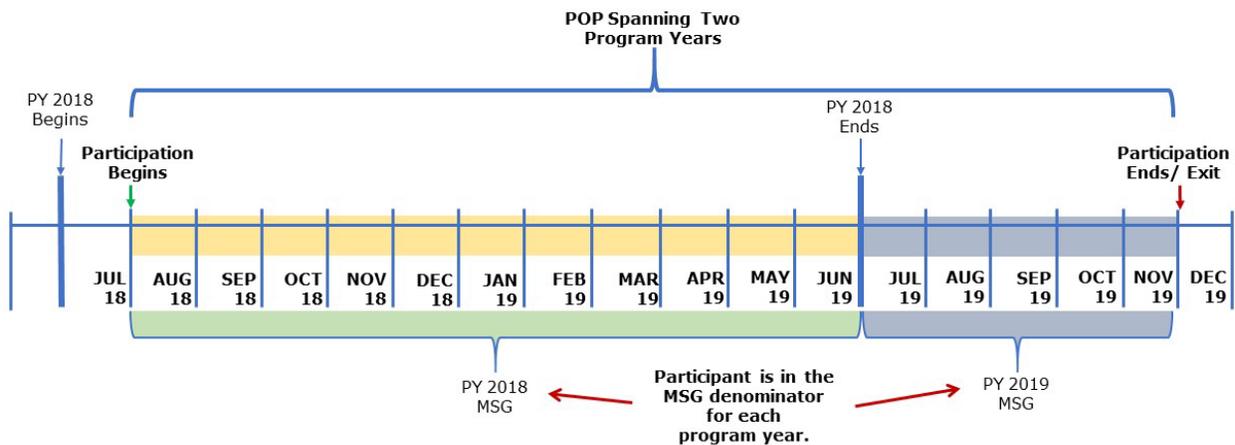
Exit-Based Measures and POPs

NLF: AEL grantees must be aware that exit-based measures are calculated after a participant's POP ends, not necessarily at the end of a program year, and that a participant with multiple POPs is counted separately for each POP in both the numerator and denominator of each applicable exit-based measure, which makes multiple independent outcomes for each POP possible.

For each POP, AEL grantees are accountable for and must manage and collect evidence of participant performance, as applicable for each exit-based measure.

For example, Figure 3 illustrates a participant with two POPs during a single program year who will have exit-based measures collected and calculated based on both POPs. Two separate outcomes will be based on the performance after each exit if the participant is in the denominator for that particular measure.

Figure 3: Exit-based measures for a participant with multiple exits in a program year
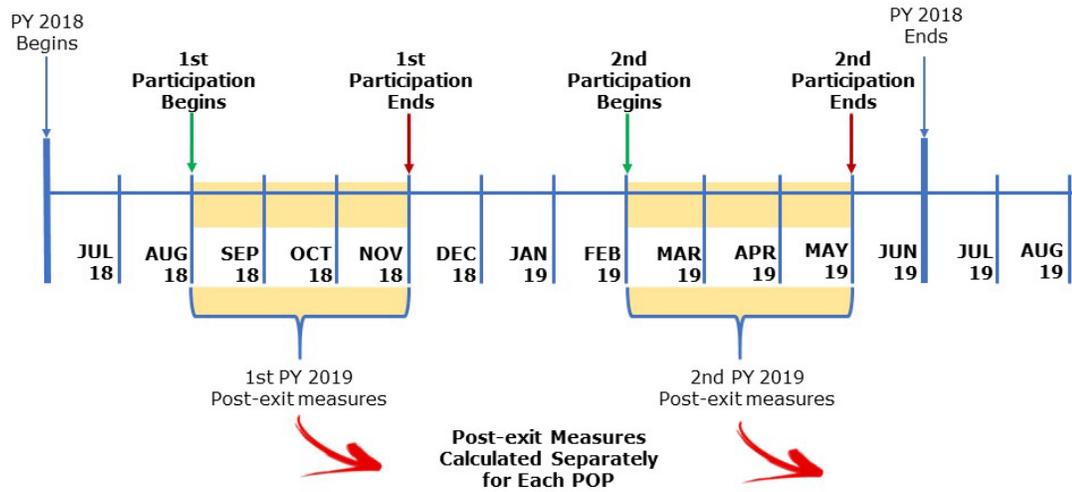
Exit-Based Measures for a POP That Spans across a Program Year

NLF: AEL grantees must be aware that a participant whose POP spans across a program year is included in the denominator only for the program year in which the participant exits. For example, Figure 4 illustrates a participant whose POP begins in PY'18 and who exits in PY'19. The individual is counted as a participant in both PY'18 and PY'19. The participant is in the denominator for MSGs in both PY'18 and PY'19, but exit-based measures must be documented and calculated based on the November 2019 exit date.

*Figure 4: Exit-based measures for a participant with one exit in two program years*
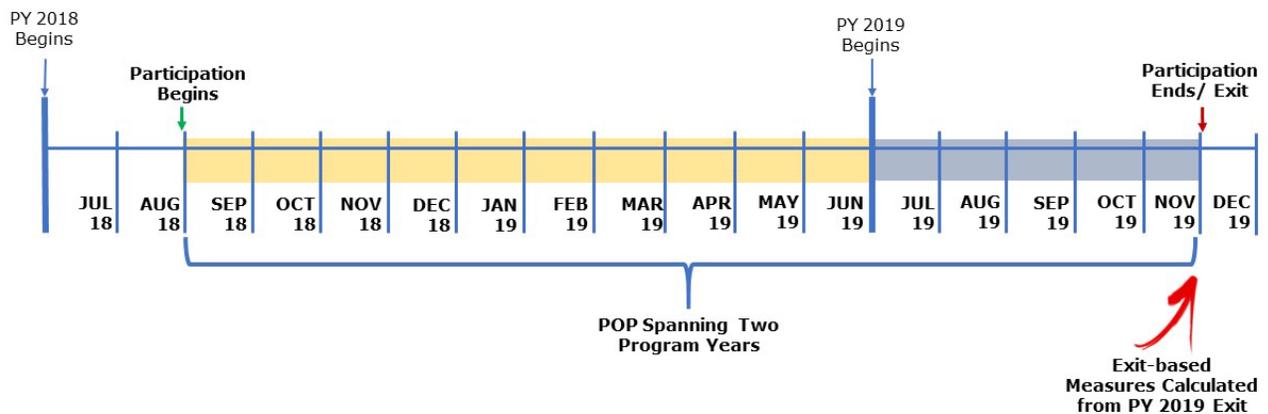
Workforce Training in an IET and Participatory Services That Extend a POP

NLF: AEL grantees must be aware that documented workforce training that is part of an IET and entered into TEAMS as "T" (training hours) can continue past the direct "D" or proxy "P" basic education hours of an IET for up to 60 days after the "D" or P" hours end, and will extend the IET and the POP, as outlined in AEL Letter 01-18, Change 1,

and subsequent issuances. After 60 days, if no contextualized "D" or "P" hours are documented for the participant, the IET and POP will end. If the participant has no additional participatory services, the 90-day period to calculate an exit will begin. (See Figure 5.)

Figure 5: Workforce Training in an IET that extends a POP
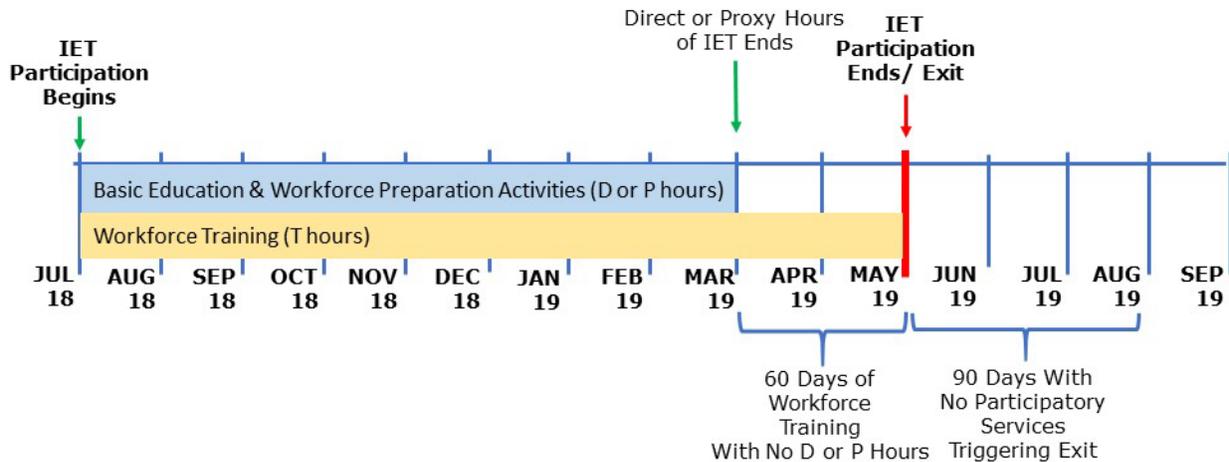
NLF: AEL grantees must be aware that actively coordinated postsecondary education and training is defined in AEL Letter 01-18, Change 1.

NLF: AEL grantees must ensure that actively coordinated postsecondary education and training is documented in TEAMS on the *Educational Outcomes* screen as "Educational Enrollment" and is only considered a participatory service if accompanied by "D" or "P" basic education services. Like the stand-alone workforce training in an IET described in Figure 4, actively coordinated postsecondary education and training that extends past the end of basic education will extend a POP for up to 60 days after the basic education ends.

Testing after a Planned Gap

NLF: AEL grantees must be aware that participants returning to AEL services from a planned gap must be given an approved test in accordance with the AEL Assessment Guide before receiving contact time to ensure that the participant is accurately placed into services on return.

Month-to-Month Planned Gap Entry

NLF: AEL grantees must be aware that planned gaps are delineated in month-to-month periods and must be entered at the beginning of each month on the *Participant Profile* screen in TEAMS. AEL grantees must communicate monthly with a participant on the status of the participant's absence to determine if the planned gap is still necessary, if the participant intends to return to specific AEL activities on the planned return date, or if an update to the planned gap end date is required.

NLF: AEL grantees must be aware that when entering a month-to-month planned gap into TEAMS, for the planned gap to continue, it must continue consecutively from the last day in one month to the first day of the following month. For example, Figure 6 describes a planned gap that begins in November 2018 and runs through April 2019. Month-to-month entries are made to ensure that the planned gap end date still aligns with the participant's plan to return to services and to keep the POP open. If no new month for the planned gap is entered for March, a participatory service must occur within 14 days to keep the POP open. If a participatory service does not occur within 14 days and 90 or more days have passed since the participant's last participatory service, exit will be triggered and calculated as of the date of the participant's last participatory service. If 90 or more days have not passed, the POP will simply continue.

Figure 6: Month-to-month planned gap entries in TEAMS
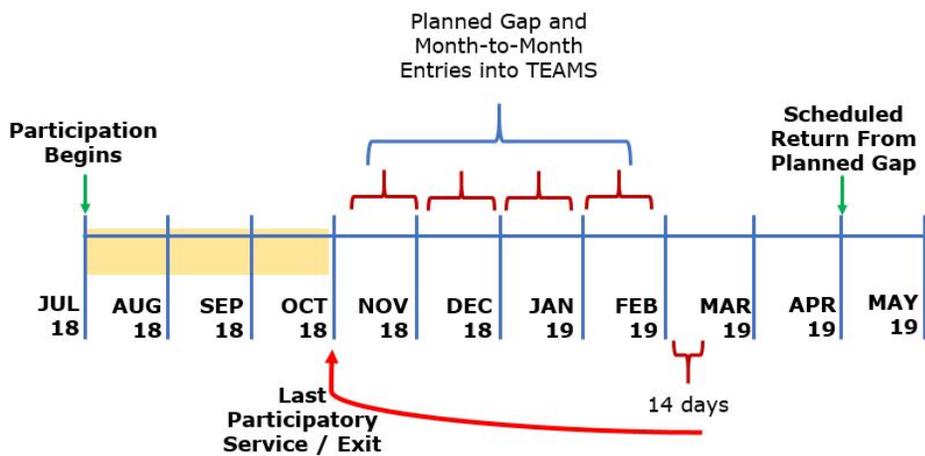
Month-to-month entries stops on March 14th. If a new planned gap is not entered, a participatory service must occur within 14 days. Otherwise, exit will be triggered back to the last participatory service.

Ending a Planned Gap with a Participatory Service

NLF: AEL grantees must be aware that if a participant receives a participatory service during an existing planned gap, the planned gap end date will be automatically updated in TEAMS to end the day before the date of the participatory service.

NLF: AEL grantees must be aware that if a participant receives a participatory service on the first day of a planned gap, the planned gap will be negated.

INQUIRIES:
Send inquiries regarding this AEL Letter to AELpolicy.clarifications@twc.state.tx.us.

REFERENCES:

Workforce Innovation and Opportunity Act, https://www.gpo.gov/fdsys/pkg/PLAW-113publ128/pdf/PLAW-113publ128.pdf

US Department of Education Office of Career, Technical, and Adult Education Program Memorandum 17-2, issued December 19, 2016; revised August 23, 2017, and entitled, "Performance Accountability Guidance for Workforce Innovation and Opportunity Act (WIOA) Title I, Title II, Title III, and Title IV Core Programs" https://www2.ed.gov/about/offices/list/ovae/pi/AdultEd/octae-program-memo-17-2.pdf

AEL Letter 01-18, Change 1, issued on September 7, 2018, and entitled, "Educational Outcomes for Adult Education and Literacy—*Update*," and subsequent issuances, https://twc.texas.gov/files/partners/AEL%2001-18ch.1-twc.pdf