

TEXAS WORKFORCE COMMISSION
Adult Education and Literacy Letter

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Date:	October 3, 2018
Keyword:	AEL
Effective:	Immediately

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

From:  Courtney Arbour, Director, Workforce Development Division

Subject: **Approved Forms of Identity**

PURPOSE:

To provide Adult Education and Literacy (AEL) grantees¹ with information and guidance on the collection of identification from participants, specifically the acceptable forms of identification and when to collect it.

BACKGROUND:

On July 1, 2018, the Texas Workforce Commission (TWC) awarded grants to administer the statewide AEL program, as authorized by Title II of the Workforce Innovation and Opportunity Act, which is the Adult Education and Family Literacy Act. The executed grants require AEL grantees to obtain a copy of an acceptable form of identification for each individual enrolling in AEL activities.

Ensuring verification of the identity of program participants supports program safety and security procedures. Additionally, an individual's identification can be used to ensure consistency between the spelling of the individual's name during program intake and subsequent entry into the Texas Educating Adults Management System (TEAMS). Correct spelling of an individual's name—including spaces, hyphens, and capitalization—can reduce high school equivalency (HSE) attainment mismatches between the Texas Education Agency (TEA) HSE database and TEAMS. For example, if “De la Cruz” is entered into TEAMS, but the name on the identification given to the HSE testing center is “Dela Cruz” or “Delacruz,” there will be a mismatch between TEAMS and the TEA HSE database.

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.”

¹ For the purposes of this AEL Letter, AEL grantees are entities that receive AEL funds through TWC.

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.”

Approved Forms of Identification

NLF: AEL grantees must include a copy of one of the following forms of identification in an individual’s file to document the individual’s identity:

- Birth certificate
- Official record showing date of birth
- Baptismal record
- DD-214, Certificate of Release or Discharge from Active Duty
- Driver’s license
- Federal, state, or local government identification card
- Hospital record of birth
- Passport
- Public assistance/social service records
- School records
- School identification card
- Work permit
- Native American tribal document
- Other official documents issued by a federal, state, or local government agency, such as discharge documents from the Texas Department of Criminal Justice, with date of birth included, or a voter registration card or certificate.
- Other official documents issued by a foreign government agency, such as a consular identification card

LF: To document identity, AEL grantees may:

- accept approved forms of identification from another state or country;
- accept approved forms of identification that are expired; and
- require additional forms of identification for enrollment into the local AEL program.

Collecting Forms of Identification

NLF: AEL grantees must implement a process for obtaining a copy of an approved form of identification during the comprehensive assessment process; this process must be documented in the grantee’s standard operating procedures for comprehensive assessment.

NLF: AEL grantees must adhere to the requirements on handling PII, such as eligibility documentation, set forth in WD Letter 13-08, issued April 1, 2008, and entitled, “Security of Personal Identity Data,” including any subsequent issuances, and WD Letter 02-18, issued March 23, 2018, and entitled, “Handling and Protection of Personally Identifiable Information and Other Sensitive Information,” including any subsequent issuances, including, but not limited to, the following:

- Sending, receiving, processing, accessing, and storing personally identifiable information (PII) must be performed only on approved computers, and not on personal mobile or computer devices.
- Photocopy machines and scanners used to copy PII must be in a secured or restricted area.
- Only authorized users may access or photocopy PII.

NLF: If an AEL grantee is unable to obtain an approved form of identity documentation from an individual, the AEL grantee must document the extenuating circumstances in the individual's file.

INQUIRIES:

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

REFERENCES:

Workforce Innovation and Opportunity Act, Title II, the Adult Education and Family Literacy Act

WD Letter 13-08, issued April 1, 2008, and entitled, "Security of Personal Identity Data," and any subsequent issuances, <https://twc.texas.gov/files/partners/13-08.pdf>

WD Letter 02-18, issued March 23, 2018, and entitled, "Handling and Protection of Personally Identifiable Information and Other Sensitive Information," and any subsequent issuances, <https://twc.texas.gov/files/partners/02-18-twc.pdf>