



# Serving New Students at a Distance

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## I. OVERVIEW

As individuals are increasingly restricted to their homes and want to remain productive, AEL services are a natural alternative when individuals desire education, support, community, stability, and enrichment. Additionally, students will increasingly face employment challenges including decreased hours and unemployment and may turn to AEL services to take the time to build skills or complete high school equivalency.

Serving new students at a distance will require dramatic changes to traditional intake and enrollment, pre-testing and eligibility determination, and distance and remote services. Grant recipients and providers should refer to the [AEL COVID-19 Response FAQ Sheet](#) and the [AEL/TWC Coronavirus Update](#) page for additional information on serving new students.

Services during this period have also created the need for the following new terms:

**Pandemic Affected Staff-determined Eligible Students (PASES)** is the term for new students who are enrolled in AEL services and served at a distance. This term will be used for tracking and reporting performance of this cohort as well as for other purposes.

**Staff-determined Eligibility** is eligibility made at a distance for individuals entering AEL without an NRS approved test included in the Texas AEL Assessment Guide.

**PASES Tracker or "Tracker"** is the Microsoft Excel reporting tool used for new students

## II. PERSONALLY IDENTIFIABLE INFORMATION

When implementing new processes and procedures for collecting and sharing student information, [WD Letter 02-18, Handling and Protection of Personally Identifiable Information and Other Sensitive Information](#) requirements and protocols must be followed. The protection of



student information is the responsibility of all of us and grantees must ensure they are adhering to Agency policy when implementing new procedures.

More information on protecting PII can be found in the [AEL COVID-19 Response FAQ Sheet](#).

### III. DEVELOPING A PLAN WITH YOUR ADMINISTRATION

Local providers should develop a plan with procedures and consider how they want to serve current and new students most effectively. It is recommended that consortia developed a consortium-wide plans with local flexibility to ensure areas like data management are well coordinated and clear across providers.

Considerations may include:

- The extent organizations want and are able to serve new students
- Methods to prioritize serving currently enrolled students and admitting new students
- The extent free online resources are available to be used with new students if there are delays in acquiring new licenses on distance learning software
- Developing instructional leadership that assists students whose academic preparedness has not been determined through a comprehensive assessment, which normally would include academic testing to determine placement
- Methods for documenting, retaining, and securing student information to protect PII as well as effectively manage instructional time

### IV. INTAKE, AT A DISTANCE

Many programs have asked how they can admit new students to services when schools are closed and social distancing is in place.

To support our system in managing information and performance for new students served at a distance, these individuals will be referred to a Pandemic Affected Staff-determined Eligible Students (PASES). Intake and enrollment for these students is at a distance, but they are unable to complete an NRS approved test included in the Texas AEL Assessment Guide.

New students are seeking AEL services in a variety of ways including calls, email, emailing and entering information into online enrollment systems. Some are also learning about remote learning options through word of mouth and seeking enrollment options. AEL providers should continue to find safe, effective, and efficient ways to positively respond to new student inquiries.

PASES enrollment information must include the following:

- Complete enrollment form including required PIRL elements
- Complete a Release of Information form



- Have a TEAMS participant record and profile
- Complete PASES Tracker when placed into class

More information can be found in the Serving New Students at a Distance section of the [AEL COVID-19 Response FAQ Sheet](#).

### Methods for Collecting Information

Intake may be managed at a distance, but providers must pay rigorous attention to protect personally identifying information (refer to PII section). The following methods to collect enrollment information have been suggested by providers:

- Conduct interviews over the phone or video call, through email, in online enrollment systems, or in real-time chat or video call
- Finalize enrollment form and release of information documentation with the student's signature through:
  - 1) confirmation email
  - 2) electronic signature via a commercial service like DocuSign®
  - 3) email confirmation accepting "terms" for sharing and release of information (return email from the students as proof of release until a hand or digital signature can be obtained)
  - 4) enrollment forms available in a secure location outside their building or open lobby area and have a locked dropbox for completed forms
  - 5) U.S. Postal Mail with self-addressed paid postage envelope
- Local programs must create procedures and track unsigned forms in the PASES Tracker to be able to collect signatures at a later date.

New students who fall under age-related eligibility that are within compulsory attendance age and lack a high school diploma or its recognized equivalent would still need verification of exemption. You can learn more about options and requirements for serving this population in AEL Letter 05-17 located at [https://twc.texas.gov/files/policy\\_letters/ael05-17.pdf](https://twc.texas.gov/files/policy_letters/ael05-17.pdf).

Some exemptions that can be verified include:

- Court order—applies to ALL sixteen-year old's, can be used for 17-18 year olds
- Parent permission
- Other approved exemptions listed in TEC §25.086, which is located at this web address: <https://statutes.capitol.texas.gov/Docs/ED/htm/ED.25.htm>. Such exemptions include:
  - Having a residence separate and apart from parent and/or guardian
  - Homelessness



## V. NEW STUDENTS OR RETURNING STUDENTS WHO HAVE EXITED

Since eligibility pre-testing will have to be delayed until remote options materialize, new students and returning students who do not have a test in TEAMS in the last 365 days should be tracked outside of TEAMS in the PASES Tracker until testing on NRS approved tests can occur.

Current AEL policy is that returning students (those who have exited) must be pretested. During COVID-19 restrictions, returning students that have a test in TEAMS showing eligibility within 365 days of class start date, the Assessment Guide 150-day test validity requirement will be waived to allow those test(s) to be used for purposes of continued eligibility and serving students in need. See the Documentation and TEAMS Data Entry for New Students section for more information.

## VI. STAFF DETERMINED ELIGIBILITY

Texas AEL is operating from a perspective that anyone seeking adult education services is likely eligible—They either lack a high school equivalency, have limited English, or know they have gaps in basic skills. Because there is no wage or income eligibility for AEL, self-attestation will be an allowable/acceptable approach to make a short-term eligibility determination. Options for distance testing on approved AEL tests are becoming available and updates can be found on the [AEL/TWC Coronavirus Update](#) page. Once testing can resume, Staff-Determined Eligibility will not be necessary.

Providers may do a Staff-Determined Eligibility when they intend to enroll new students who cannot be tested and therefore cannot be placed into TEAMS. Documentation and tracking is still important and required, see Section Documentation and TEAMS Data Entry for New Students.

Short term, staff determined eligibility may be considered for the following individuals who are:

- Basic skills deficient;
- Does not have a secondary school diploma or it's recognized equivalent, and has not achieved an equivalent level of education; or
- English Language Learners defined as someone who:
  - has limited ability in speaking, reading, writing or understanding English language;
  - lives in a family or community environment where a language other than English is the dominant language; or
  - has native language is a language other than English.

### Class Placement

Class placement is separate and apart from Staff-Determined Eligibility and staff should use resources available to determine placement based on academic skill and preparedness. Some options may include, but are not limited to:



- Use a pre-test from online software
- Conducting an oral interview with an English language learner and get a writing sample (including email)
- History of postsecondary schooling or training for those with an HSE/HS diploma

## VII. DOCUMENTATION AND TEAMS DATA ENTRY FOR NEW STUDENTS

Providers must be aware that they will not be able to enroll a new or in some instances returning participants<sup>1</sup> in a class in TEAMS without an approved test. For this reason, grantees are responsible for developing procedures to ensure:

- PII is protected when correspondence and remote and distance learning options are implemented
- New or returning students undergo Staff-Determined Eligibility. Eligibility is defined in AEL Letter 05-20 at [https://twc.texas.gov/files/policy\\_letters/ael-05-20-twc.pdf](https://twc.texas.gov/files/policy_letters/ael-05-20-twc.pdf) as:
  - basic skills deficient;
  - does not have a secondary school diploma or its recognized equivalent, and has not achieved an equivalent level of education; or
  - is an English language learner.

You can find acceptable parameters in the section Staff Determined Eligibility.

- New participants complete an enrollment form (PIRL) and release of information either through online options, phone calls, one on one conferencing, or other methods that ensures individuals can complete non-test related PASES enrollment requirements.
- TWC has provided a PASES Tracker to grant recipients to record the minimum information to be collected during intake of new students
- Finalizing the PASES enrollment with the student's signature either at time of online enrollment or can be obtained through an electronic signature after initial enrollment information is obtained. These can generally be performed through email, or commercial services like DocuSign®. The method must document the individual's agreement to information to be shared with state and federal offices. This includes:
  - Creating a participant record and profile in TEAMS.
  - SSN, Driver License should still be requested but student could choose not to disclose
  - Identity documentation if unable to be collected or pose a threat to PII should be noted so follow-up can occur in the future. If unable to collect documentation, enter into TEAMS as 'Unable to Obtain Documentation—extenuating circumstance

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<sup>1</sup> Returning participants with a test in TEAMS within the last 365 days, should be tracked in TEAMS per data entry guidelines.



noted in file', then make a comment in TEAMS under Document Number using alpha characters "COVID-19"

The screenshot shows a form with several fields. At the top, there is a checkbox labeled 'DL/State ID Did Not Disclose'. Below it, there is a section for 'Identity Document Used\*' with a dropdown menu currently set to 'Unable to Obtain Documentation'. To the right of this dropdown is a 'Document Number' field containing the text 'COVID 19'. A red arrow points to this field. Further right is an 'Upload Identity Document File:' section with a 'Browse...' button. Below these fields are two more rows, each with an 'Other Document Type' field and a 'Document Number' field.

Figure 1: TEAMS Screenshot - Unable to Obtain Documentation

### Class Contact Hour Collection and Tracking

Contact hours earned including direct, proxy, and training must be captured through a locally developed tracking sheet at a class level for new students unable to complete pre-testing requirements.

- Documentation of contact hours are still required, see [Adult Education and Literacy](#)
- [COVID-19 Response FAQ Sheet](#) to assist you with determining methods for documenting remote learning or distance learning contact time.
  - Providers must ensure that they update their local standard operating procedures to include acceptable documentation for above referenced non-traditional direct hours that adheres to 'identity verifiable' documentation. This could include but are not limited to: roll call document signed by instructors, print outs of who logged into webinars and/or video conferencing, or use of personal log on numbers provided to students (access codes) that can be tracked by facilitators/moderators indicating that the student is participating in the instructional activities. The documentation of participant names should also include class name/number, date, time in/out and instructor name
  - Tracking and capture of information should be collected on a class level tracking system and language included in a Data Management SOP
  - Locally developed tracking sheets for class level contact time should be developed and must include:
    - Class Name/Class Number
    - Coursework
    - DL Model/DL Curriculum being used
    - Assigned Instructor
    - Daily accrual of direct, proxy and training hours

The goal is to be able to back enter data and/or have data to report that follows federal guidelines, so it is imperative to follow current TEAMS protocols even outside of the system.