Adult Education and Literacy
COVID-19 FAQ Sheet

Note: Guidance is forthcoming on:

- Intake and enrollment of new students

Thanks for your patience! Anson

Using this Document

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I. Information for Students

1) Cancellations

Q) How do I find out if a class is cancelled?

A) You can check the status of the local program openings and operations here: https://tcall.tamu.edu/search.aspx

Q) How do I find out if a scheduled HSE tests have been cancelled?

A) TEA confirmed that HSE testing centers are sending out emails to test takers notifying them of closures. If the individual did not provide an email address when they signed up--they will be responsible for checking test center websites for closure information. Testing centers contact information can be found here:

- GED Test: https://wsr.pearsonvue.com/testtaker/registration/SelectTestCenterProximity/GEDTS?conversationId=886058

2) High School Equivalency (3/18/20)

Q) Can I take the high school equivalency test online?

A) No. All official high school equivalency tests are taken at certified testing centers across the state. https://tea.texas.gov/student-assessment/certificate-of-high-school-equivalency/frequently-asked-questions-about-high-school-equivalency-testing#4.
II. General TWC Questions

3) Contacting TWC AEL Staff (3/18/20)

Q) How do I contact TWC AEL?

A) TWC AEL staff are fully operating but all staff are working from home. The following contact info can be used to communicate with AEL Texas.
COVID-19 pandemic related information and general questions: AELTA@twc.state.tx.us
(This goes to several TWC AEL staff including Anson Green and Mahalia Baldini)
(3/20/20)
  • Contract management email: BAEL@twc.state.tx.us (3/20/20)
  • Program specific email: Email your Program Support Specialist
  • Anson Green: 512.348.5874 (text is best!) or anson.green@twc.state.tx.us
  • TEAMS questions: TEAMS.TechnicalAssistance@twc.state.tx.us. Data validation extensions and TEAMS access. Please submit an email with the subject line:
    EXTENSION REQUEST. Include an expected completion date in your request.

4) Survey on AEL/TWC Coronavirus Updates

Q) Where can I find the AEL/TWC Coronavirus Update survey?

A) There are two COVID-19 local impact surveys
   Survey 1: https://www.surveymonkey.com/r/AELimpact
   Survey 2: https://www.surveymonkey.com/r/COVID19-Update2

Q) Does Texas AEL send special initiative programs (Accelerate Texas, Ability to Benefit, Distance Learning Mentor, etc.) surveys and emails regarding the COVID-19 pandemic response?

A) Yes, if you are not receiving emails, please send a request to anson.green@twc.state.tx.us
III. Fiscal / Grant Questions

5) Paying Staff (New 3/25/20)

NOTE: Multiple questions are answered under this response.

Q) Can we continue to pay part-time instructional staff for planning activity as we attempt to transition to virtual classrooms, etc. even though; we are not generating contact hours due to campus class suspensions?
Q) If our school board decided to pay employees during this emergency, do we follow that and pay our staff with our grant?
Q) What if our agency doesn't agree with paying part time teachers if they are not teaching?
Q) Should we use state leadership funds for part time instructors who are not teaching?
Q) Can we pay clerical staff?
Q) Can staff be paid their average working hours?

A) The OMB Uniform Guidance cost principles that ordinarily govern the allowability of compensation and fringe benefits under Federal awards continue to apply with respect to compensation and leave paid to employees during COVID-19 closures. Refer to the cost principles in Subpart E of the OMB Uniform Guidance. This includes those at 2 CFR 200.430 Compensation—Personal Services and 2 CFR 200.431 Compensation—Fringe Benefits, as well as those that apply more generally to all costs, including, but not limited to conditions for costs to be necessary and reasonable for the performance of the award and allocable thereto (2 CFR 200.403(a)), conform to limitations or exclusions set forth in these cost principles or the award (2 CFR 200.403(b)), be consistent with policies and procedures that apply uniformly to both federally-financed and other activities of the entity (2 CFR 200.403(c)), be accorded consistent treatment as a direct or indirect cost (2 CFR 200.403(d)), and be adequately documented (2 CR 200.403(g)). In considering whether a cost is reasonable, consideration must be given to factors described in the cost principles, including but not limited to consideration as to whether the entity significantly deviates from its established practices and policies regarding the incurrence of costs such that the deviation unjustifiably increase the award’s cost (2 CFR 200.404(e)). Similar provisions exist in the State’s Uniform Grant Management Standards (UGMS).
In considering the referenced cost principles, COVID-19 related paid leave that is charged to a TWC grant award must be made pursuant to an official decision by the grantee’s leadership that applies uniformly to all activities of that entity. For example, if an entity’s leadership officially decides to pay all full-time personnel but not part-time personnel, the TWC grant can be used to pay the grant’s allocable share of paid leave for full-time personnel but not part-time personnel. Similarly, if the entity’s leadership officially authorizes paid leave for all clerical personnel, the TWC grant can be used to pay the grant’s allocable share of those costs, but if the entity’s leadership does not approve pay for clerical personnel, such leave would not be allowable to the TWC grant.

If an entity has both grant-funded activities and other activities, and seeks to pay COVID-19 leave to the grant-funded personnel only, such leave would likely be unallowable, because it treats grant-related activities different in a way that results in higher costs to those grants than would otherwise occur if they entity treated grant-funded personnel the same as its other personnel.

The amount paid must be consistent with the entity’s policies and be uniformly applied to both grant-financed and other activities. If an entity’s leadership decides to pay COVID-19 leave to part-time personnel, the amount charged to a TWC grant award for the award’s allocable share of such payments cannot exceed what would be reasonable considering the number of hours ordinarily worked by the part-time personnel.

Q) The Board policy for our ISD provides premium pay at time-and-a-half for certain personnel who are required to work during COVID-19. Can the higher rate of pay be charged to the TWC AEL grant?

A) The portion of the pay that is allocable to the TWC grant and paid pursuant to established local policy, consistently applied, would be an eligible grant cost.

6) Working Remotely (Revised 3/25/20)

Q) Will TWC reimburse costs through the established grant for staff to work remotely to continue to provide services to our students?

A) The Governor’s Office has encouraged that, “For offices and workplaces that remain open, employees should practice good hygiene and, where feasible, work from home in order to achieve optimum isolation from COVID-19.” Consistent with that message, TWC recognizes the responsibility that a grantee has for the health and safety of the grantee’s personnel and the authority that a grantee’s leadership has to permit personnel to work from home where feasible.
Additionally, where necessary and reasonable health and safety precautions do not permit normal face-to-face interaction with participants/students, TWC encourages grantees to offer remote access to services where possible.

7) **Instructor Use of Time (3/20/20)**

Q) Our instructor time and effort forms are going to look very different—they will include more classroom prep (filming class lessons for posting/conference call). Is this acceptable?

A) TWC does not provide guidance on acceptable work as it relates to staff time and effort. Staff time though should reflect effort that supports or provides AEL activities.

8) **Managing Consortium Grant Costs (New 3/25/20)**

Q) If a provider is part of an AEL consortium, must the lead agency of the consortium respect and pay the time-and-a-half costs of a provider? Or can the lead agency of the consortium deny the increased payment. Depending on the amount of increase, paying would require the lead agency of the consortium to amend the budgets of one or more of the consortium members.

A) Under the OMB Uniform Guidance, “The [cost] principles are designed to provide that Federal awards bear their fair share of cost recognized under these principles except where restricted or prohibited by statute.” (2 C.F.R. § 200.100(c)). Arbitrarily prohibiting a provider from recovering allowable costs would be inconsistent with that provision of the OMB Uniform Guidance. Please contact your TWC Grant Manager if you have concerns about award amounts or other award restrictions.

9) **Lapsed Instructor Contracts (New 3/25/20)**

Q) Our PT instructors are contracted; what if their contract is over and they do not have an active class?

A) We assume that the grantee’s financial obligation to the instructor ended when the instructor’s contract ended. If that is not the case, please provide additional details to TWC AEL staff.
V. Performance / Testing Questions

10) Performance *(New. 3/25/19)*

**Q)** What considerations is TWC giving for performance based on the impacts of the COVID-19 pandemic?

**A)** TWC understands that performance results for many measures may be impacted by COVID-19, which has closed many schools, halted or slowed enrollments, and paused all proctored performance testing as well as high school equivalency testing center operations.

We anticipate demand for AEL services among existing participants will be impacted and altered as programs move to remote and distance learning options for students with access to online learning. Additionally, demand may begin to increase as a result of growing unemployment. We also understand that there will be delayed data entry beginning in March 2020 and that this delay may continue as a result of school closers.

TWC is operating under the following general principles during this period:

- We understand that performance on many measures is likely going to be impacted by COVID-19 and efforts to slow its spread;
- It is too early to know what that impact is going to be;
- We are going to monitor the situation to determine what the appropriate recommendations are;
- Those recommendations will be informed by what the data shows and that nobody should fail performance solely as a result of COVID-19 and related efforts to slow its spread.

11) Delayed Classes *(3/18/20)*

**Q)** How we should address the potential impact on our contract outcomes caused by delays and closures? Especially as it relates to IET’s.

**A)** This type of situation is impacting training providers and colleges across the state. If you believe a contract extension would support student completion once this closure period is over, please contact your TWC grant manager for an extension. Please also see TWC guidance at:  
[https://tcall.tamu.edu/docs/TexasWorkforceCommissionGranteeInformation.pdf](https://tcall.tamu.edu/docs/TexasWorkforceCommissionGranteeInformation.pdf)
13) Testing

Q) Is there any possibility that the U.S. Department of Education can waive the progress testing requirements and, if not, how will everyone handle testing? (3/20/20)

A) Not at this time. The Department of Education is aware of pending performance problems for adult education across the country. Anson Green seriously doubts waiving testing requirements would be an option, but state’s may be able to renegotiate performance. AEL Texas staff will share updates through this FAQ and via emails to AEL Grantees.

Q) Are there any allowable modifications to testing being considered - say remote testing options? Can we pre-test or post-test online using tests like GED READY or Practice HiSET? (3/20/20)

A) No. There are no currently approved distance testing options for AEL performance. Only the tests approved in the Texas AEL Assessment Guide are allowed for pre and post testing.

14) Planned Gaps (3/20/20)

Q) Should programs place students on Planned Gaps if the program is on extended break or modified working schedule? If so, what would those circumstances look like?

A) A Planned Gap can be used if the program feels confident it can stay in touch with the student monthly to review planned gap status. See Planned Gap policy in the AEL Assessment Guide. For more information on planned gaps, see AEL Letter 01-19 - Periods of Participation for Adult Education and Literacy.

VI. Distance and Remote Learning

15) Distance Learning

Q) How do I offer distance learning? (3/18/20)

A) Complete information and policy on distance learning (DL), including approved DL curriculum can be found at: https://tcall.tamu.edu/dlti.html.

Q) Is it necessary for personnel to participate in the DL Modules in order to offer DL? (3/18/20)

A) No, the DL Modules are being waived through May 15th, 2020.
Q) With the closing of schools in our consortium due to COVID-19 concerns, will we have an extension on submitting our DL Plan or will it still be due on April 15th? Our schools are closing through the end of the month and perhaps longer.

A) The deadline for submitting Distance Learning Plans has been moved to May 31st, subject to change depending on how things progress with closures.

Q) Does the Distance Learning Plan due date requirement apply to our Accelerate Texas funded programs? (3/18/20)

A) Distance Learning is not a requirement of the Accelerate Texas grants, and you do not need to submit a DL Plan as a Accelerate Texas grantee. DL Plans are required only for core TWC AEL grantees. ACC is required to participate in distance learning activities and to complete a distance learning plan and has done so. The Distance Learning State Policy can be found on the TCALL website here: https://tcall.tamu.edu/twcael/initiatives/dlstatepol.html and contains the definition of distance learning as it is used in AEL.

Q) USA Learns is on the approved distance learning list, but not in TEAMS. Can it be added to TEAMS? (3/18/20)

A) Yes, USA Learns is approved. We currently have a request into the TEAMS IT to add four curriculum providers that are on the approved DL curriculum list but not currently in the system. We are tentatively scheduled for a 4/30/2020 release date of this enhancement. To use an approved curriculum that is not currently in the system, you can enter proxy hours under a comparable model for the time being and then switch the provider in the applicable class once the enhancement is made. For example, USA Learns, a clocktime model, is one of the four not currently in the system. You should enter your hours under one of the other clocktime models, such as Aztec or Burlington English, for the time being, and then switch the provider once it becomes available in TEAMS.

Q) Does AEL Letter 06-17 - Distance Learning Call Center TEAMS data entry apply to other MOU's? Do we need to have a "business agreement in place" to implement distance learning on platforms like google classroom, CANVAS, Skype or Zoom? (3/20/20)
A). No, an MOU or business agreement is not necessary for implementing distance learning or other remote learning services. AEL Letter 06-17 - Distance Learning Call Center, applies only to the services that were offered by the vendor of the Distance Learning Call Center.

16) **Remote Learning (Updated 3/25/20)**

**Q) What is Remote Learning? (Modified 3/25/20)**

A) Remote Learning occurs when the student and instructor are separated by distance and therefore cannot meet in a physical classroom setting. The instruction and communication are synchronous. Learning content or teaching is typically transmitted via technology (email, chat, discussion boards, video conference, audio bridge) so that no physical presence in the classroom is required. Contact hours for remote learning are counted in TEAMS as direct hours if they are greater than 15 minutes. Remote learning does not use approved DL Curriculum, otherwise it is distance learning and the hours are counted as proxy hours. Unlike distance learning, remote learning must occur synchronously in real time.

**Q) What is synchronous instruction? (NEW 3/25/20)**

A) Synchronous instruction involves learning where a group of students are engaging with an instructor in learning activities at the same time whether in person or virtual. The instructor and students communicate in real time using web conferencing tools, phone, instant messaging, live chat, webinars, video conferencing etc. Remote or distance learning that does not occur at the same time is called anonymous instruction (For information on documenting synchronous AEL activities, see Section Documentation of Hours and Activity for Distance, Remote, and App-based Learning)

**Q) Can we use academic packets or course materials and count the hours as direct hours in remote learning. (3/23/20)**

A) No, unless the work on instructional packets is done in a remote learning context through synchronous in real time instruction. (See Question 1 under Distance and Remote Learning)

**Q) Do we need to edit class name to “remote”?**

A) No, that is not necessary.
17) Direct Contact Hours and Proxy Hours

Q) What is the difference between direct contact hours and proxy hours? (3/18/20)

A) Participants in distance learning must have at least 12 hours of direct contact before they can be counted for federal reporting purposes. Direct contact hours involve interaction between the participant and program staff in real time. Direct contact hours can be a combination of direct face-to-face contact as well as contact through phone, video, teleconference, or online communication in which the identity of the participant and the amount of time expended on the activity can be verified. Live online discussions, telephone conference calls, and live video broadcasts to remote locations are examples of direct contact hours that are countable under this definition.

In addition to direct contact hours, programs may also report proxy hours to track time participants spend on distance learning activities. Proxy hours differ from direct contact hours in that the identity of the participant and/or the exact amount of time spent on a learning activity cannot always be verified. Proxy hours are tied to an approved curriculum for distance learning and are entered into TEAMS separately from direct hours. All proxy hours must be documented using the method described by the approved distance learning curriculum.

Using these types of webinar/video conferencing platforms to capture **direct contact hours** also encourages teachers to engage with distance and remote learning students on a regular basis, especially if students cannot attend physical classes.

- Teachers can use the video/webinar conference tools to present a lesson on a similar topic that may have been covered in the DL curriculum modules or teach a separate but complimentary lesson that reinforces the DL curriculum lessons but does not reteach it.
- Teachers can use the video/webinar conference tools to check-in to update student goals, etc.
- Teachers can use the video/webinar conference tools to encourage online collaboration and peer support amongst students.
- Finally, most of these conferencing tools have internal tracking mechanisms in place that allow teachers to download a report showing the total amount of real-time expended by each student.
Q) Without a physical sign-in sheet how do we collect attendance for remote learning such as conference calls with students/ Zoom classes/ YouTube assignments? How do we monitor direct hours with apps and document these hours in TEAMS. What backup documentation would be needed for monitoring purposes? (3/20/20)

A) Whether it is distance, remote, and app-based, all distance education activities must provide a method for participants and program staff to interact and participant identity must be verifiable as well as track contact hours. There are multiple ways to document hours and student activity for distance and remote learning. The State Guidance for Distance Learning from the AEL Assessment Guide provides several options for documenting contact hours when the class is remote or the app or software does not electronically track clock time. According to TWC AEL guidance:

“direct contact hours involve interaction between the participant and program staff in real time. Direct contact hours can be a combination of direct face-to-face contact as well as contact through phone, video, teleconference, or online communication in which the identity of the participant and the amount of time expended on the activity can be verified. Live online discussions, telephone calls, and live video broadcasts to remote locations are examples of direct contact hours that are countable under this definition.”

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. Please ensure that you are not implementing processes that jeopardize and/or contradict guidance in TWC WD Letter 02-18 on keeping student information confidential. So, don’t use a Social Security Number as a unique identifier for logging into virtual systems, etc.
Q) Can a conference call with students serve as a form of direct hours? (3/23/20)
A) Yes, any calls with students related to instruction and support equal to or greater than 15 minutes can be counted toward direct hours. (For information on documenting synchronous AEL activities, see Section Documentation of Hours and Activity for Distance, Remote, and App-based Learning)

VII. Technology

Q) Some of our faculty have very limited internet or computer access. What are some ideas to help us help our part time instructors out with technology?
A) Resources for free or reduced internet access and related topics can be found under FREE Internet Provider Offers on the AEL/TWC Coronavirus Update TCALL page. On March 19, 2020, TWC removed many limitations related to purchasing laptops, computers, tablets, or WIFI hotspots and similar items. For guidance, see AEL Letter 05-20 Modifications to Grants Awarded under TWC RFP 320-18-01, Adult Education 11 and Literacy Service Provider Grant.

18) Online subscriptions and Licenses (New 3/25/20)
Q Regarding online subscriptions, can we purchase licenses ending June 30 or can we do end of year? End of the year or December 31, 2020?
A) More information is needed to respond specifically to individual circumstances, but in general, a grantee must limit its use of TWC grant funds to make prepayments to its vendors to what is necessary and reasonable for the performance of the award. If a grantee needs to purchase online license subscriptions to facilitate a temporary shift to a distance learning strategy in response to COVID-19, any prepayments must conform to the same administrative requirements and cost principles that ordinarily apply to TWC grant funds. This includes giving consideration to the entity’s normal policy on making prepayments for its other activities. For example, if an entity’s accounting policies limit the extent to which it makes prepayments to vendors, those limitations would also be considered with respect to the allowability of payments made with TWC grant funds.
Example: If the vendor that provides the license subscription does not require prepayment—for example, if the vendor ordinarily requires payment on a month-to-month basis—and prepayment of multiple months in advance would not result in a substantial cost savings to the program, the prepayment would not likely be an appropriate use of grant funds if the ordinary month-to-month payment will make the licenses available to the program in a manner that meets the program’s service delivery needs. Additionally, no one is certain how long the COVID-19 social distancing and associated distance learning strategies will be called for or remain appropriate. Even if prepayment is necessary and reasonable under a specific set of circumstances, reasonable measures need to be taken to avoid the potential for waste from non-use of purchased licenses if the distance learning need were to end before the licenses expire. If specific guidance is needed for a particular set of circumstances, please provide the specific details of those circumstances to TWC AEL staff.

19) Laptops and Related Computer Supplies

Q) Do we have authority to purchase more laptops and related computer supplies to expand our distance education services? (3/23/20)

A) Yes, on March 19, 2020, TWC removed many limitations related to purchasing laptops, computers, tablets or WIFI hotspots and similar items. Prior approval requirement regarding equipment having a per-unit acquisition cost of $5,000 or more continues to apply. For guidance, see AEL Letter 05-20 Modifications to Grants Awarded under TWC RFP 320-18-01, Adult Education 11 and Literacy Service Provider Grant.

Q) Does the prior approval requirement for computer costs of $5,000 or more apply to distance learning software too? (3/23/20)

A) The prior approval requirement applies to any single item that costs $5,000 or more, not just laptops and related computer supplies.
Under the prior approval requirement for equipment, a grantee must submit TWC Form 7100 to the assigned TWC grant manager before purchasing tangible personal property that has both a useful life greater than one year and a per-unit acquisition cost of $5,000 or more. For guidance, see AEL Letter 05-20 Modifications to Grants Awarded under TWC RFP 320-18-01, Adult Education 11 and Literacy Service Provider Grant.
Q) With so many free apps and digital resources becoming available, do these still need to be TWC-approved options to count as proxy hours?

A) Yes. While students can benefit from a wide variety of distance learning options, in order to collect reportable proxy hours for distance learning, approved distance learning programs must be used. A list of approved programs can be found here: https://tcall.tamu.edu/twcael/initiatives/distcurriculum.html

VIII. Program Operations

20) Orientation

Q) Will requirements for orientation and on-boarding change?

A) Requirements have not changed, institutions can conduct these virtually, at their discretion. (For information on documenting synchronous AEL activities, see Section Documentation of Hours and Activity for Distance, Remote, and App-based Learning)

21) Data Entry / Reporting

Q) Will there be an extension to enter 3rd quarter data since some programs still had two weeks left to test and are now on extended breaks?

A) Yes, we understand that there will be delayed data entry beginning in March 2020 and that this delay may continue as a result of school closers.

Q) What do we do if the business office is closed and we cannot retrieve financial information to compile the data for monthly activity reports?

A) Please contact your grant manager to discuss any extensions needed.

22) Supplies

Q) Can Adult Ed providers purchase cleaning supplies and protective gear masks and gloves to address the COVID-19 pandemic? (New 3/25/20)

A) Necessary and reasonable cleaning supplies, and protective masks and gloves that are purchased for use by healthy AEL provider personnel who are reasonably required to have contact with students during the COVID-19 pandemic are eligible grant costs. Contact your TWC grant manager if you need to make a budget change to accommodate the costs.
23) Evaluation Survey *(New 3/25/20)*

**Q** The AEL Intake Evaluation Survey is due March 27. Has that been extended?

**A** Yes