

Texas Workforce Commission

Adult Education and Literacy



Summer Business Meeting 2020

Q&A Submissions by Session

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Day 1 Session 1: CDER

1. We were told with our AEL contracts to put in payroll (future months) into an obligation. Right or wrong to do this?

PENDING ANSWER

2. We can't get an employee dishonesty bond beyond \$100k and it limits our draw down abilities.

The \$100k will only limit you every 3-day period.

Day 1 Session 2: Cost Principles

1. I am wanting to make sure that my last guidance from TWC is still true. I do allow subs to have admin costs, but I do not list the subs' admin costs in my budget detail because all subs' costs are listed under Contractual. However, I track subs' admin costs to ensure that we do not exceed the admin cap. Am I doing this correctly?

PENDING ANSWER

2. Two or more years ago, TWC told us that we do not include subrecipient administrative costs in our budget detail. HOWEVER, we were told to track subs' administrative costs internally. This we have done faithfully for several years. We have always assured that subs' administrative costs plus LCOT's administrative costs did not exceed the limit. Is this still the correct way to do this? Or, as you said today, do I even have to track sub administrative costs?

TWC issued the current AEL local provider grant awards under TWC RFP 320-18-01. Pursuant to Section 16.4 of RFP 320-18-01, "Only the administrative costs of the Offeror are subject to the administrative cost limits in this RFP. Costs for other consortium members are program costs under this RFP and are not subject to the administrative cost limit in this RFP."

As the grant recipient, lead organization, and fiscal agent for TWC local provider grant award 0118ALA000, the Literacy Council of Tyler (LCOT) has the primary administrative responsibilities for that award, and its ALA subrecipients exist for service delivery purposes. In that respect, LCOT should *monitor* its ALA subrecipients' administrative cost levels to assure that subrecipients primarily use the subgrants for programmatic costs. For that purpose, TWC would encourage LCOT to continue to require LCOT's ALA subrecipients to distinguish between administrative-type and programmatic expenditures in those subrecipients' respective accounting systems, and when those subrecipients report their ALA subgrant expenditures to LCOT. However, consistent with the classification described in RFP 320-18-01, it is permissible, for TWC's purposes, for LCOT's accounting system to record all expenditures of LCOT's ALA subrecipients as programmatic costs. As reflected in TWC RFP 320-18-01, TWC considers those costs to be programmatic (non-administrative) costs. TWC does not intend for LCOT to apply the administrative-type costs of LCOT's ALA subrecipients against the administrative cost limit(s) of grant award 0118ALA000.

3. Is indirect cost an admin cost?

PENDING ANSWER

4. When you get to the indirect cost section, are grantees eligible to elect the 10% de-minimis indirect cost option?

PENDING ANSWER

5. How much is the admin cap for the grant award?

PENDING ANSWER

6. Regarding matching--if the grant being pursued is NOT federally funded (for example from a private corporation or non-governmental organization) could AEL grant dollars serve as match?

PENDING ANSWER

7. What do the acronyms UG and UGMS stand for?

UG = Uniform Guidance; UGMS = Uniform Grant Management Standards

8. Is apparel for staff of recruitment events (not students) allowable or not?

PENDING ANSWER

Day 2 Session 1: SRM and Audit Resolution

1. Is the AEL Assessment Guide up and official now? I checked a week or so ago and thought it still said draft on it.

OCTAE approved our guide July 16, we can now remove the 'draft' designation. We are in the process of doing this.

**2. Is there a form to justify the reasonableness of a purchase?
(Fiscal Areas Tested)**

There is not a standard form from TWC. Applicable documentation requirements for the purchase can be found in the FMGC.

Documentation should be in line with your organization's policies and procedures and should be appropriate for total value of the procurement and method selected. Some examples for small purchases would be:

- A requisition form with places to write in 2 or more quotes and a line for justification of selecting other than the lowest price.
- Handwritten phone quotes from several vendors demonstrating price, as well as shipping and volume discounts, if applicable.
- Internet quotes from several vendors demonstrating price, as well as shipping and volume discounts, if applicable.
- A memo describing the situation at the time the decision was made, the factors considered, and any other information relevant to the procurement action.

3. How long does the justification for a purchase need to be?

It just needs to be written with sufficient detail for an outside party to follow the justification. It can be a few simple statements.

4. Where can I find the "Financial Manual for Grants & Contracts (FMGC)?"

<https://twc.texas.gov/agency/financial-manual-grants-contracts>

- 5. I am pretty sure we were told we had to get bids for <\$3,000. This is much more restrictive than our college policy, which is \$10,000. Is \$10,000 the correct threshold?**

As of January 1, 2020, the micro purchase threshold is \$10,000 and less. Purchases over that amount are small purchases and require price or rate quotations. Before January 1, 2020, the micro purchase threshold was \$3,000. The FMGC contains more information. We test based on TWC rules and your own policies in place at the time the purchase was made.

- 6. Where is the final documentation outlining acceptable "signatures" for the remote situation? Will our change in our local SOP to accept verbal/chat docs/other allowances be sufficient during our remote enrollment time?**

Please contact your TWC AEL manager for further information on applicable signatures for remote situations. SRM will work with our AEL department and monitor against what guidance has been given for signatures in remote situations. Before a review, we hold a pre-planning meeting where we meet with contract managers and other TWC staff and discuss any specific guidance that has been given to the grantees. We also review any correspondence documented in WRAPS (our contracting system).

- 7. Does the order have to be signed by a judge for a 16-year-old? Can it be an "order" from a probation officer?**

We have accepted this as long as the documentation from the probation officer indicates that a court order is in place and the referral is to carry out that order.

8. What if a school refuses to issue an official withdrawal document for the student? Or if the school has closed? What documents would be acceptable to establish eligibility?

[AEL Letter 05-17](#) provides guidance on determining if a student is not enrolled or planning to be enrolled in secondary education options.

9. We use DocuSign for all of our eligibility forms. If a student marks yes, and we learn that it should have been no or vice versa, it isn't possible for the student to change the selection. Is it acceptable for the data staff to note on the DocuSign (after confirming with the individual) the areas that are inaccurate?

If the student is able to email and confirm the change and if the email was kept in the file for student, SRM would consider that an acceptable paper trail.

10. We require w/d papers from the last school attended and parental permission for 18-year-old individuals during intake. It was mentioned that required documents are only needed for 16 & 17-year-old individuals. Can you please clarify?

[TEC 25.085](#) indicates compulsory school attendance is required for those who lack a high school diploma or equivalent to be enrolled unless they have an exemption outlined in [TEC 25.086](#). The exemptions include: court order, parent permission, homelessness, living separate and apart from parent/guardian (has own residence).

11. How long do we need to maintain files for?

Your contract identifies how long you are required to maintain the files. Please refer to Section 12: Retention.

12. Will monitoring visits still be happening (generally) around the same time period, or will everything be pushed back due to COVID?

We are currently working on our FY21 monitoring schedule. COVID-19 is an ever-changing situation, but we are planning onsite visits and will adjust our schedule or conduct remote reviews, if necessary.

13. If a monitor comes year 20/21 but is monitoring for yr 2019/2020 will they use the assessment guide for 2016/2017?

Yes, we will use the guide that was in place during our review scope. The scope we are reviewing will be included in the Document Request Packet (DRP).

14. My program's last audit requested student assessment for the student's entire time in the program. Is this a common practice? Will grantees be required to keep assessments on file for longer than 2 years for a student?

AEL Grants are multiple year contracts, therefore, if you are a new Grantee and we had not monitored you, then we may ask for the documentation; however, normally we will only look at documentation for the current year that we are reviewing.

15. Could a TWC monitor explain an example of checking on a community college's training program to illustrate some of the good documentation and bad documentation that they found?

Usually the issues are with missing signatures on forms or other missing information. Also documents that are entirely missing. Sign in sheets with missing information is a common problem as well. Also,

any information that you are entering in TEAMS such as test scores should match the documentation you have in the participant file.

Issue most commonly noted were missing documentation for eligibility purposes, this may result in a questioned cost. 16-year olds not having a court order, no documentation for school dropout, missing assessments in the file, the IEP was not updated or completed. No documentation students attended class (missing attendance).

Good documentation may include, organized class files with all supporting documentation neatly organized, all student files available for review, documents were all complete signed and up to date. Assessments were legible, completed, and retained in the file.

- Insufficient documentation to support the method of procurement for goods or services
- Purchases of goods or services that were not allowable or supported the program.
- Printing of brochures or purchasing of outreach material without proper taglines.

Day 2 Session 2: TxCHSE Vouchers

All questions submitted during the TxCHSE Vouchers session will be covered under the AEL Letter – coming out soon.

Day 3 Session 1: AEL Program Updates

- 1. Will the staff PD exemption forms be processed prior to August 15? Meaning - will the providers receive a response on whether**

we are approved to move forward with the staff member in question?

Yes, we will process the form and return form to you for purposes of assigning instructors to classes, etc. We will not be able to process these in TEAMS until the new program year is opened.

2. Will we still get to see how we are doing compared to the rest of the state?

Yes, the MPR will still be sent out by the AEL interim director/director each month as it is received.

3. When is the next time to apply for the AEL grant? How many years do we have with the current award in the consortium?

We are currently in year three of a five-year grant cycle. The next competition will be for contracted grants to start July 1, 2023.

4. Is the EOY information the same as in the June MPR?

Yes.

5. We developed an online enrollment with all the information required on TEAMS and TWC. Does TWC have to approve an online enrollment before we put the online enrollment live?

No pre-approval is needed. Be sure to modify enrollment forms, online or paper, when new guidance is provided by TWC, this will be through an AEL Letter.

6. Do you have data that compares total number of student hours for 18-19 with total number of student hours for 19-20?

Yes, you can get this information in Several TEAMS reports and while they are not 100% aligned to WIOA performance, they will give you a general idea of student contact hours by class, site, provider. One option, Report path: Report Search>Participant Count by Funding Source, Site, and Class.

7. "Will training hours for IET be counted as contact hours in the new program (considering pandemic/closures) so we can progress test them sooner to gain MSG Type 1 or will be just for entering in TEAMS with no credit? "

No. Training hours are not going to be counted as contact hours for basic skills for test taking purposes. IET requires that you teach basic skills concurrently with training skills which are not the same as teaching a technical skill set, such as using a tool or performing a competency using a certain machine, tool, instrument, etc.

8. If we cannot set the targets that TWC recommends, wouldn't that possibly mean we would have a reduction in funding?

The purpose of the target negotiation process is for you to recommend what you can accomplish with your funding. For example, if you feel that current social distancing restrictions and course closures/class cuts will be a challenge in providing quality IET's, but may want to consider more basic or intensive service options.

9. Remote assessment is rough because of students' lack of technology skills and computers. How will non-baselined students we enroll be considered with the targets? Will they count towards enrollment? Count against us for MSGs?

We are still considering options for Non NRS tested students in relation to enrollment targets, we do not currently have plans to count Non NRS tested students in MSG measures.

10.Can or should providers propose a voluntary deobligation?

Grantees have the option to voluntarily deobligate funds at any time. For more information on this, please review TAC §802.79 Voluntary Deobligation of AEL Funds, located at <https://twc.texas.gov/files/twc/rules-chapter-800-general-administration-twc.pdf>.

11.If there are additional items required on the Enrollment Form (additional PIRL items), that would not be required until the date of the letter, correct? Students enrolled since July 1st would not be affected?

Correct.

12.For the WII Deliverables survey and Core Grant survey - will both of these surveys will be sent to us each month?

The links are static and while the questions will be updated each month to reflect current conditions, the link URL will not change. We will provide a reminder and URL's each month on the bi-weekly call to complete the surveys by the 24th of each month. We will open the surveys each month on the 20th. Also, look for meeting maker reminders from Kara McVey that include the survey links for each deliverable.

13.Was there an AEL Survey, other than WII due on July 24? I thought WII was the only survey due.

Starting in August and moving forward, you will have two surveys due on the 24th of each month. One is for updates on pandemic related challenges and expenditures against your Core grant. The other is specifically for WII grant activities to provide qualitative information on the expenditure activities you are reporting in CDER under 'Supplemental' for WII grant.

Day 3 Session 2: TEAMS Updates

- 1. If a student starts off as a Non-NRS but later is tested with an NRS approved test, will the direct hours count for the entire time or just from the NRS approved test date and forward?**

It will only count for reporting purposes or traditional counting purposes, from the time you have an NRS approved test and forward.

- 2. GED Official Practice Test = GED Ready Test?**

Correct.

- 3. How will assessments look like for returning students whose approved NRS tests are about to expire but they are in class after July 1, 2020? Will assessment after July 1st be baseline or posttest if their last assessment is more than 150 days less than 365 days and they achieved a gain by June 30, 2019?**

In order to register a student to a class in PY 20-21, they will need at least one NRS approved test that is less than 365 days old at the class registration start date AND the first contact hour date. A baseline test is decided at first contact hour. After the first contact hour and an established baseline, any same test instrument/content area test will be considered a progress test.

- 4. Can providers be allowed to administer only 1 of the TABE tests? This would help reduce the amount of time we need to spend supporting the student remotely. The current assessment guide says we have to administer other areas within the first 12 hours.**

This is allowable in the current Assessment Guide, under the section 'Exemptions from Testing in All Content Areas'. Providers should document why they were unable to meet the 'first 12 hour' requirement and have a plan for testing in other areas as needed or any other allowable exemption as listed in the guide.

- 5. So, we can't mix NRS assessed students in the same class with Non-assessed students?**

Not for the purpose of reporting students in TEAMS. Non NRS designated classes can only track Non NRS tested students. Creating the parallel class allows for easier tracking of students who still need an NRS approved test.

- 6. Has the TEAMS Training. related to 'Employment Outcomes' that was scheduled but cancelled a few weeks ago been rescheduled?**

No, it has not been rescheduled yet, look for it end of August or beginning of September!

- 7. If we have a student that exited BEST Plus 2.0 oral and not Literacy. What happens to those students if we are not administering the Literacy exam face to face?**

Considerations should be made for other approved NRS test or the student can be tracked under Non NRS tested due to the lack of availability of Best Literacy.

8. I'm a little confused about what NRS means and stands for. Is NRS high school level students?

NRS stand for National Reporting System.

9. Will we have to indicate these separate classes on separate class rosters?

No, but a modification to your class rosters may need to be made to indicate to data entry staff which students do not have an NRS approved test so they can pinpoint the parallel class to track contact hours.

10. We use the TABE test. Is TABE "NRS approved"?

Yes, TABE 11 & 12 is approved.

11. Regarding these Non-NRS parallel classes, will hours performed there count towards student/program progress?

No. However it would be acceptable to utilize the instruction time toward considerations for testing before the required minimum hours of instruction are met, if appropriate. You can find this language in the Assessment Guide, section "Testing Before the Required Minimum Hours of Instruction".

12. Are we required to test those students whose tests are about to expire (365 days) but they are registered in class after July 1?

If you have a student in class now without a test within 365 days of the class start date and the first contact hour date, you will not be able to enter those attendance hours in TEAMS once TEAMS open. We are asking you to prioritize for testing, those students whose latest test is close to that 365 mark.

13.If students have already been in a class without NRS and then get one. Do they actually have to be transferred now?

Yes, they will need to be put in a regular class in TEAMS and tracked there moving forward after the NRS approved test. TEAMS has built in rules that will notify you when a student registered for a Non NRS class has completed an NRS approved test

14.So, at this point, we shouldn't count on non-NRS students counting as part of our enrollment targets?

We are still in discussions about this approach.

15.Will TEAMS allow the Data Specialist to enter the contact hours for those students under the Non-NRS class?

Yes, it will work in function at the class level just like any other class.

16.Students that have already been in class without NRS approved test and then get one, do they actually have to be transferred now?

Yes, once an approved NRS test is completed, students should be tracked in a regular class.

17.Are tests good for 150 days or 365?

365 days

18. Will it be possible to enroll an 'exiter' who has an assessment in TEAMS that's less than 365 days old into a class for participants with an approved NRS assessment?

Yes, due to pandemic related challenges, we are making an exception for exiters who are returning to services and still have a valid test within the last 365 days before class start date and before first contact hour.

19. Where can we access the latest TEAMS release notes?

The latest TEAMS release notes were sent in a Transmittal email from Mahalia on 07/24/2020 around 5:23 PM. They will be posted to the TCALL website once it is accessible.

20. If all tests are given on different days but the first contact hour is after all tests have been completed, will placement be based on lowest score or first test?

Revised Assessment Guide language states:

Initial EFL Placement: Federal regulations CFR §462.42 require AEL providers to place students in an appropriate EFL level based on the scores of an NRS pretest. AEL providers are required to test individuals in all content areas, and an individual will be placed in an EFL for the program year based on one of the following:

- the lowest test score, if all content area tests are taken on the same day
- the earliest test score available, given new flexibilities to stagger tests in different content areas.

21. Will this removal of DOS's apply the Participant Roster and other reports?

Yes. Since we are technically removing 'DOS' the reports will be affected in different ways. The participant roster will still show a test as a 'baseline' and will show any other associated gains, but the MSG Management report is a better option to see all test applied in the context of WIOA reporting. We are currently working to update existing reports and create new options.

22. What happens to someone in TEAMS with a valid test on July 1, then their NRS approved test expires July 15. are we not able to enter contact hours in teams anymore for them? do we move them in the non-NRS, parallel class after that point?

The test validity is for the purposes of establishing a baseline for the program year and is reviewed at two points: class registration and first contact hour per class. So, if on July 1st the test is valid but reaches more than 365 days on July 15th and you do not add the student to class until July 16th, you will have to place the student in a Non NRS approved test and class until they receive a valid NRS approved test.

23. If a new student started class July 1 and was tested four days later. Are we able to back date the test to the day the student started class?

No. The test date in TEAMS should reflect the date the test was actually taken by the student. Students should not be placed into class until they have either a NRS approved test or Non NRS approved assessment to determine eligibility.

24. Are students who are non NRS tested automatically become participants after 12 hours or not until they are NRS assessment?

At this time, only NRS tested students with 12 direct will be reported to OCTAE as participants. However, we are discussing options for counting Non NRS tested students toward contracted enrollment targets. More to come on this.

25. Can we shift from TABE to Casas test during our current Accelerate Texas grant?

Yes. For new participants, you can change your instrument. For those with a pre-test with TABE, you would want to capture a gain through a post-test with the same instrument.

26. I'm not seeing "Test Summary" on the participant record in TEAMS. Is this forthcoming? When will the new "test summary" page update be implemented?

New Pages are tentatively scheduled for availability in TEAMS for September 8th, 2020.

27. Will there be dates on the Test Summary page or a way to know what grantee administered the test?

Yes, the revision to the pages is to ensure that all grantees can see test results at a participant level and know the results of those test are applicable for establishing a baseline as well as results of any progress earned through post-testing. It will also include transparency of which grantees received performance credit as a result of the test if the student participated with multiple grantees within a period of participation.

28. Student has a TABE and CASAS. How will this affect the Grant Recipient as far as performance?

MSG's earned through post testing can be applied to any instrument within the program year that has both a baseline test and a post test in that same instrument and content area. If a student has both a TABE and CASAS test, they can earn gains on either instrument with a post test in that same instrument/content area. This has always been the case and will continue to be so.

29. Will 90-day exit rule be voided due to COVID?

Students will still exit if they go more than 90 days without contact hours. However, if they return to services and still have a valid test (<365 days old), you can re-enroll them without additional testing. Old test will act as the 'baseline' for the new period of participation.

30. It would be nice if TEAMS had a report building menu such as dBase where you can select fields to include, etc. Is that not possible?

Not possible in TEAMS; however, this will be possible in TABLEAU. We are working with Department of Operational Insight to ensure that all users have access to these more query-based reports at a Grantee, Provider, Site and Class level.

31. Please know that in the remote world adding more required PIRLS questions is very difficult. On a related note, is there an option to offering a "N/A" or prefer not to disclose an option. It is tough to explain why they have to choose this to Hispanic people.

Yes, the primary reason to update the profile is to include options for 'Chose Not to Disclose' as an option on many of the elements. We are including the minimum number of elements required under WIOA.