Serving New Students at a Distance

NOTE: This is a discussion paper and NOT for implementation. Texas AEL intends to collect feedback via this survey <https://www.surveymonkey.com/r/2FPWP6R> until April 1st and then release the finalized guidance, a tracking tool, and an FAQ by the end of next week.

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# 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.

# PERSONALLY IDENTIFIABLE INFORMATION

When implementing new process and procedures for collecting and sharing student information, WD Letter 02-18 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.

You can locate this guidance at <https://twc.texas.gov/files/policy_letters/wd-02-18-twc.pdf>

# DEVELOP A PLAN WITH YOUR ADMINISTRATION

Local providers may develop a plan and consider how they want to serve all students most effectively.

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 as opposed to acquiring new licenses on distance learning software
* Developing instructional leadership that assist 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 as well as instructional time

Providers have the option not to admit students at this time.

# 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.

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 seek enrollment options. AEL providers should continue to find safe, effective, and efficient ways to positively respond to new student inquiries.

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

* Conduct interviews over the phone, through email, in online enrollment systems, or in real-time chat.
* 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. Snail mail with self-addressed paid postage envelope
* Local programs must create procedures and track unsigned forms in the TWC issued template to be able to collect signatures at a later date

New students who fall under age-related eligibility that are within compulsory attendance age would still need documentation 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>.

Some exemptions that can be documented include:

* Court order—applies to ALL sixteen-year old, can be used for 17-18 year old
* 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:
	+ Has a residence separate and apart from parent and/or guardian
	+ Homeless

# NEW AND RETURNING STUDENTS WHO HAVE EXITED

Since eligibility pre-testing will have to be delayed until online options materialize, new students and returning students that do not have a test in TEAMS in the last 365 days should be tracked outside of TEAMS until proctored testing can occur.

Current AEL policy is that returning students (those who have exited) must be pretested. This requirement is waived until local program operations return to a status where proctored testing can occur. For 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 during this time period 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 section for more.)

# SHORT TERM SELF-ATTESTED ELIGIBILITY DETERMINATION

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. TWC AEL staff are reviewing options for distance testing on approved AEL tests. Once testing can resume, short term self-attested eligibility determination will no longer be allowed.

Providers may do a *short term self-attested eligibility determination* 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, self-attested eligibility determination may be considered for the following:

* Individuals without a high school equivalency or high school diploma.
* Those individuals with a HSE or HSD assessed through an intake interview, stated goals, and years out of school to determine likelihood of basic skills deficiency.
* 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
	+ native language is a language other than English

## Class Placement

Class placement is separate and apart from self-attested eligibility determination and staff should use resources available to determine placement based on academic skill and preparedness. Some options may include, not are not limited to:

Use a pre-test for an online software

Conducting an oral interview with an ELL and get a writing sample (Including email)

History of postsecondary schooling or training for those with a HSE/HSD

# 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[[1]](#footnote-2) 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 self-attestation of eligibility. Eligibility is defined in AEL Letter 05-20 at <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 section “Short Term Self Attested 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 enrollment requirements.
* TWC will provide a tracker that has the minimum information that should be collected during intake of new students
* Finalizing the 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 noted in file’, then make a comment in TEAMS under Document Number using alpha characters “COVID-19”



## 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 FAQ located at <https://tcall.tamu.edu/index.htm> 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.

1. Returning participants with a test in TEAMS within the last 365 days, should be tracked in TEAMS per data entry guidelines. [↑](#footnote-ref-2)