

# Texas Adult Education Funding and Grants 2017 Part 2

## Slide 1: Texas Adult Education Funding and Grants

Hello this is Anson Green with Part 2 in our series of introduction webinars on Texas' Adult Education and Literacy system. This webinar is going to be focused on funding and grants.

## Slide2: Overview

In the webinars, in Part 1, we explore the basic 101 of adult education and literacy, including program objective models that drive performance in our systems and the greater workforce system and how that integrates with adult education and literacy. In this webinar, we're going to focus on federal funding authorization and requirements, as well as competitive grant requirements and guidelines.

## Slide 3: Federal and State Funding

Let's talk about how the dynamic adult education and literacy system in Texas is funded and take a closer look at the resources as well as some of the integration of some of those resources.

## Slide 4: Workforce Funding FYI 2017

This image shows just how broad the Texas workforce system is in terms of the different types of programs and interconnectivity with those programs. As we see, TWC has an annual budget of \$1.5 billion and is the only workforce system, or the only state really, that has all the services of the Workforce Innovation and Opportunity Act, all the of programs, as well as several other state and federal programs that really provide a robust, inner connected system workforce education and training services. This really helps us leverage inner connectivity with these different programs. And, as we explored in Webinar 1, how those integrated service models where students are getting a basic education services, as well as workforce training, support service, employment services, are integrated together. It becomes much easier for us to do that in Texas because we have so much to draw from.

## Slide 5: Funding Flow

In terms of adult education and literacy, our services come from the federal government, from two primary agencies: the U.S. Health and Human Services agency and the U.S. Department of Education. Those authorizations and those allocations come to TWC and become our basic competitive grant process. We award grants at the state level to grant recipients, and these grant recipients can take the form of: consortia, which are solidified and codified through a formal agreement; partnerships, which are agreements and alignment with employers, that include employers — this is a new eligible provider in WIOA--it's the partnership between an employer and another eligible provider; and then sole providers which are organizations that apply and are awarded, or they submit a proposal and are awarded on their own, and they often do also include other organizations, but not within a consortium agreement.

## Slide 6: Competitive Grant Requirements and Guidelines

Let's talk a little bit more about competitive grants and the requirements and guidelines. And unlike many workforce development programs, adult education and literacy is required by federal statute to be administered by the state agency, so by the Texas Workforce Commission. Many of our federal grants are allocated to our workforce development boards, and then those boards release those funds through grants or other mechanisms to local agencies. Adult education and literacy is a state-funded and state-administered program. So, the relationship between local providers is direct to the Texas Workforce Commission and my office.

## Slide 7: State and Federal Requirements

We can see the flow of requirements. Essentially, the Workforce Innovation and Opportunity Act – this is Title II -- and the Adult Education and Family Literacy Act, that is the authorization at the federal level. This goes into our Texas Workforce Commission rules, which we'll talk more about in a minute. And then locally, there may be other requirements that local providers place on themselves, in terms of grant administration and service delivery.

## Slide 8: Citations

Some citations to begin with and we'll revisit these. The regulations for adult education and literacy at the federal level are in Chapter 463 and then the TWC rules are Chapter

800 on general administration. 802 is on the integrity of the workforce system and 805 is adult education and literacy chapter.

## Slide 9: Federal Regulations

So let's turn our attention to the federal regulations first. And we'll look at the AEFLA, or Adult Education and Family Literacy Act, regulations at Chapter 463. I meant to make reference to it earlier but the Adult Education and Family Literacy Act is often referred to WIOA Title II, so both of those names are used interchangeably.

## Slide 10: Federal Regulations – Contains Seven Rules

Federal regulations outline seven different rules for adult education and literacy grant administration. In Chapter 463.20, there's the description of how the state must follow a process when making awards. This defines the state-awarding process. Chapter 463.21 outlines the alignment with the local workforce plan. Chapter 463.22 includes the information that must be in a grant proposal or grant solicitation or grant application. Chapter 463.23 lists eligible providers for services and funding. 463.24 establishes a new criteria related to local providers being required to provide some sort of demonstrated effectiveness which we'll talk about in a few minutes. Local admin, or local administrative, cost limits are at 463.25. And the activities that are considered local administrative costs are at 463.26.

## Slide 11: Competitive Grants

So let's talk about competitive grants and what the federal requirements say. First, there must be direct and equitable access to adult education and literacy funds at the state level. That means the submission of proposals goes directly to TWC for the Workforce Commission. The process for selecting providers gives each entity a fair chance to receive an award. Competitive, multi-year grants must be administered by the state agency. So, these are not one-year grants, they must be multi-year grants. Then the same grant announcement process for proposals must be used for all providers. So, everyone has the same grant proposal solicitation that they respond to and the same process applies to all eligible providers for multi-year grants.

## Slide 12: 13 Considerations

A very important component of the regulations, and this is found in Section 231(e) are what are commonly considered the 13 considerations that the state must consider when

they're awarding local grants. And these considerations are included in the grant solicitation document as stipulated in federal law.

### **Slide 13: 13 Considerations for AEL Grants**

So, I'm going to walk through these and outline exactly what the 13 considerations are. Under WIA there was a similar process but there were only 12 factors. WIOA has modified all the factors to some extent and added a thirteenth factor.

### **Slide 14: Consideration 1**

So, consideration 1 is when the Workforce Commission awards grants and contracts, it must (inaudible) to some degree to which the eligible provider is aligned to and meets the regional needs as identified by the local Workforce Board plan under Section 108 of WIOA. So, each local workforce area has a local Workforce Board and that Board submits to TWC and eventually gets approved by the governor a plan for service delivery. Adult education and literacy providers must align aspects of their program to the goals, objectives, and other components of the local workforce plan. So, in future grant solicitations this, which is a new consideration under WIOA, this'll be a very helpful component to help facilitate integrated service delivery.

The local Workforce Board plans are available online and those are plans that are multi-year plans that are updated as needed. In those plans is a description of service delivery for individuals in the community who are identified as most in need. Those include individuals with low levels of literacy and English Language Learners—two populations very familiar to adult education and literacy.

### **Slide 15: Consideration 2**

Consideration 2 states that TWC must consider in grants and contracts the ability of the service provider to serve eligible individuals with disabilities, including individuals with learning disabilities. Here in (inaudible) in future service delivery and their grantees are the integration of the Vocational Rehabilitation services programs will help us very handily meet this program. And local programs are already doing a very good job of integrating with their VR, or Vocational Rehabilitation, partners.

### **Slide 16: Consideration 3**

Consideration 3 states that the Workforce Commission in its grants and contracts must consider the past effectiveness of the eligible provider in providing adult education and literacy services against the state-adjusted levels of performance, and especially with respect to eligible individuals who have low levels of literacy. We'll talk more about this requirement when we look at the demonstrated effectiveness information that I previewed earlier.

### **Slide 17: Consideration 4**

Consideration 4 again speaks to the demonstrated alignment between the activities and services as well as two of those services that are outlined in the local workforce plan and local one-stop partners.

### **Slide 18: Consideration 5**

Consideration 5 really speaks to the delivery of services in the adult education and literacy and to what extent those services have sufficient intensity and quality and are based on research to ensure the best return on investment for student learning. This includes practices where the providers are using the essential components of reading instruction that are based on research in reading.

### **Slide 19: Consideration 6**

Consideration 6 speaks to the fact that other reading, writing, speaking, mathematics, and ESL (or English Language Acquisition), instruction must be delivered based on these best practices and based on research, including scientifically valid research on effective educational practice.

### **Slide 20: Consideration 7**

Consideration 7 speaks to to what extent the eligible provider is effectively using technology, including distance education, in the delivery of services to deliver greater performance.

### **Slide 21: Consideration 8**

Consideration 8 means that the Texas Workforce Commission must consider in grants and contracts to what extent learning is provided in such a way and service delivery is

provided in such a way that is contextual, including through contextual models, such as the Integrated Education and Training, so that individuals can transition and complete postsecondary education and training, and obtain and advance in employment to attain economic self-sufficiency.

Consideration 8 really places the requirement of the state and, thus, into its grants to local providers, for the delivery of Integrated Education and Training a sharp focus on transition to and, notably, completion of postsecondary education and training and employment. In the prior law, the focus was really on transition to postsecondary education and training. Now, this inclusion of completion really posits the system to work as a greater system with our high ed partners to make sure we are tracking individuals all the way to completion of that postsecondary education and training.

## **Slide 22: Consideration 9**

Consideration 9 speaks to the quality of our instructional and our administrative workforce and requires that local providers meet the minimum qualifications established by the state which would be our professional development and staff qualifications that are outlined in Chapter 805 of our rules. And also ensures and requires that the state make available high quality professional development, including through electronic means, distance education and other means. In Texas, we're very proud to have a strong service delivery mechanism through our learning management system, so that individuals can get the professional development that's required in our rules at a time and a place in a manner that meets their needs.

## **Slide 23: Consideration 10**

Consideration 10 speaks to the alignment and coordination of service delivery across other education, training, and social service resources in the community and specifically noting these alignments with community-based, educational, workforce, and other organizations as they relate to the development of career pathways. So, here in our Consideration 10, a focus on career pathways but also a focus on career pathways as developed and delivered in an integrated service delivery manner. So not one organization doing this but an integrated approach, which we previewed in detail in our first webinar.

## **Slide 24: Consideration 11**

Consideration 11 speaks to the requirement for flexible scheduling and coordination to help individuals, including individuals with disabilities and special needs, attend and complete programs.

## **Slide 25: Consideration 12**

Consideration 12 speaks to the requirement for a high-quality information management system to do data reporting and to monitor program performance. In Texas, of course, we have a very robust system known as TEAMS, and TEAMS is our data management information MIS system.

## **Slide 26: Consideration 13**

Consideration 13, the last one, requires the state to determine to what extent there's a demonstrated need for additional ESL, or English language acquisition, program and civics education programs. In Texas, ESL and the English language learner population is our largest population of adult education students. And, of course, we have a great demonstrated need.

So those are the 13 considerations that all states are required to address the requirements in grant solicitations.

## **Slide 27: Demonstrated Effectiveness**

And within that, I want to underscore another requirement that's in our regulations, WIOA Title II, at Section 463. And this is this new requirement that eligible providers making a proposal in response to a grant solicitation show demonstrated effectiveness.

## **Slide 28: Establishing Demonstrated Effectiveness**

So, for the purpose of showing demonstrated effectiveness the requirement in the regulation states that performance data must be provided of the organization and its ability to serve the eligible individuals that are for adult education and literacy services in the domains of reading, writing, mathematics, English language acquisition, and other subject areas that are relevant in the state plan. So these may be career pathways or other types of services that the state or here, in Texas, the Workforce Commission would deem as relevant. An eligible provider must provide information regarding its

outcomes for participants related to employment, attainment of high school diploma or its recognized equivalent, and transition to postsecondary education and training.

## **Slide 29: Two Ways to Demonstrate Effectiveness**

There are in the regulations, two ways to demonstrate effectiveness. Previously funded providers would be able to provide their performance related to the data which is required under Section 116 of WIOA which is the performance accountability section of the statute. So, that would be the standard performance metrics that our current providers are held to. And then, new organizations which have not had adult education and literacy grants and, thus, would not have that performance can provide other information—commensurate data—on their past effectiveness in serving the same or similar population of basic skills deficient, eligible individuals in reading, writing, math, and other subject areas, as well as the attainment of secondary diploma or transition to postsecondary education.

So, here we have kind of this—for the next year or so—what can be seen as a level playing field in terms of what types of information is going to be submitted. It's always a level playing field, but right now the previously funded or current providers have only been collecting the performance data under Section 116 of WIOA for a short period and in some areas of performance still do not have, under the MIS, any way to report some of that data because we are kind of in a transition period as all states are in, in building our system for WIOA performance accountability. So, the states that are doing their competitions currently and states, like Texas, that will be doing their competitions in the future, are kind of in an area where everyone is going to be providing kind of somewhat similar data, but not necessarily all of it coming out any one data system. TEAMS doesn't collect all this data currently and no other system in Texas does. So, when I say there's an even playing field, everybody has to find ways to demonstrate and collect this performance through local systems when providing responses to this section of future grant applications.

## **Slide 30: Competitive Grants – Texas Requirements**

The competitive grant requirements in terms of what Texas requires are similar but have some nuances and augment some of what are in the federal requirements. So, our funding is allocated as it's set forth in Chapter 800 of those TWC rules I referenced earlier. And those rules provide an allocation methodology for each funding stream. And, very importantly, the allocations for our funds are aligned to counties and to local

workforce areas. So when grant submissions for the statewide grant, or grant solicitations for the statewide program, are released they provide a table that shows that shows the actual allocation by county and per workforce area to help individuals that are submitting proposals to know how much money is available in a local workforce area. So, that is very prescribed in our rules and it's not much of a competitive process in terms of price. The competitive aspects lie in other areas. Cheaper programs don't have any type of advantage over higher cost-per participant; the costs are the same. Everyone must adhere to a standard cost methodology outlined by county and workforce area. Administrative limits reflect those in federal law for Adult Education and Family Literacy Act. But because our local grants also have state funding and TANF funding, remember we have integrated funding services from the federal level, there are different administrative limits for those other areas.

Recall, the federal law requires multi-year grants. In Texas, we have defined that as two years with options of treating one year renewals that are at the Commission's discretion. And in considering a renewal, the Commission takes into account performance and other factors. And performance targets are based by the Commission on an approved process that's Commission-approved each year for performance.

### **Slide 31: Competitive Grants – Texas Service Delivery**

Other Texas service delivery information and grants are outlined in Chapter 805.42. And here, each eligible grant recipient has a demonstrated ability to plan and develops service delivery that includes a broad analysis of the educational, economic, and workforce development trends. As well as providing eligible AEL students with comprehensive and locally responsive services, and doing so by expanding, improving, and coordinating service delivery of education, career training, and workforce development across different service providers.

### **Slide 32: Eligible Providers, WIOA Title II**

The eligible providers are outlined in WIOA. They include local educational agencies which includes independent school districts, county departments of education and local educational service centers. Community or faith-based organizations, volunteer literacy organizations, institutions of higher education which includes community and technical colleges, public and private non-profits, libraries, public housing authorities, any nonprofit institution that is not described above in numbers 1 through 7. And then, number 9, consortium of entities listed in 1 to 8; these entities of this consortium signed

a letter of agreement, or MOU, or other such document that codifies the consortium. And submits that when they submit their proposal And then number 10 is a new organization. An arrangement, which is a partnership between an employer (public or private) and an entity described in any of the numbers above. And then 11, is described in the statute as really any other organization not previously described that has demonstrated effectiveness. So a wide variety of eligible providers. Individual organizations must identify which type they are when they make a proposal. But that allows for a wide variety of different types of entities to succeed and have access to federal funding for adult education and literacy services.

### **Slide 33: Important Definitions, §805.2**

Some important definitions that are in our rules are related to the definition of a consortium, which is a partnership of educational, workforce development, social service entities, and other public or private organizations that agree to partner, collaborate, plan, and apply for funding to provide adult education and literacy and related services.

And then the grant recipient is responsible for ensuring compliance with all services and reporting to the Workforce Commission. The service provider are providers that provide direct services to local program. And then we have separated out as a separate definition a fiscal agent which is the organization responsible for making and filing all financial reports to the grant recipient on behalf of a consortium.

So we specifically outlined and describe these differently, independently, to provide the most amount of flexibility at the local level for organizations to come together and provide a proposal. And I want to provide some examples of what those organizational arrangements might look like. These, of course, wouldn't be the only ways to arrange your local services and provide that type of arrangement in a responsive grant solicitation, but these do provide some ideas for how different types of organizations can best propose their strengths in a consortium or another arrangement.

### **Slide 34: Essential Program Components §805.4**

So before looking at those different types of arrangements, the essential components are outlined in our rules for service delivery. These include the basic adult education services we've seen before but also include a requirement that services help individuals access further education, employment-related training, or employment. Provide

assessment and guidance services. And a requirement to collaborate with multiple partners in the community to expand the service available to adult learners.

So, in many ways our rules in Texas, which were codified in 2014, were a harbinger for things to come in WIOA related to that integrated service delivery model across multiple partners in employment and -training focus.

### **Slide 34: Program Delivery System, §805.42**

Other important aspects outlined in the rules include a demonstration for the eligible grant recipient to plan and develop a service delivery strategy that really uses a broad analysis of the needs and trends of the local workforce area. And a plan on how to expand and improve service delivery across different types of outcome competencies.

### **Slide 35: Consortium Requirements, §805.42**

Consortium requirements are outlined in 805. Consortia must outline when they submit a proposal and include a letter of agreement or MOU, states such that they designate which entities will be within the consortium and which will serve as either a lead organization of the consortium as well as a fiscal agent for the consortium. The fiscal agent's responsible for in making and filing all financial reports, as previously stated. And in the proposal if a consortium does not identify a lead organization of the consortium, this is kind of an organizing agency that helps coordinate the consortium, if they don't identify this in the written agreement, the AEL grant recipient will assume those responsibilities of the lead organization.

### **Slide 36: Local Flexibility – Example 1**

So here are some of those examples that I mentioned earlier of ways local areas can leverage their strengths through multi-agency alignments. And make such a organization be a consortium applicant or entity to a grant solicitation.

So in this arrangement, a college is a grant recipient, fiscal agent and acting as a lead organization. Remember those can be separate roles and they're also providing services. But their consortium includes an independent school district service provider, an employer association as a service provider. That employer would be under a partnership proposal where the employer is partnering with the other organization and maybe providing workforce training, or employment services for workers. Community-based organization is providing services and the workforce board is included as planning and data co-enrollment organization within the proposal.

## **Slide 37: Local Flexibility—Example 2**

In the next example, the Board, Workforce Board is a grant recipient and fiscal agent. And they have elected the educational service center in the area as the lead organization that is organizing a consortium that includes a library that might be providing distance learning services, and independent school district as providing adult education and literacy services, and a community college that might be providing workforce training for the consortium. Again, another example.

## **Slide 37: Local Flexibility—Example 3**

The third example has a community-based organization acting as the grant recipient and lead organization of a consortium that includes a Board as a fiscal agent only. Of course, there would be any required coordination and co-enrollment happening there, but the official role in the consortium is as fiscal agent. And a CBO may do that because they know the Workforce Board understands grant management at TWC, understands monitoring at TWC and they have a stronger fiscal basis than a CBO does to provide a strong service delivery in a grant proposal. And then, included in this arrangement an educational service center is a service provider.

## **Slide 38: Local Flexibility—Example 4**

In this last example, we have a local education agency, maybe a school district, acting as grant recipient fiscal agent and service provider. But not as a consortium, but really doing an MOU or contract or both with the Board for planning and data referral and the community college for workforce training for integrated education and training models, for example.

## **Slide 39: Conclusion**

So, those are some examples to conclude with to kind of seed ideas for organizations in the field that are looking to compete for this grant in 2017 under the Workforce Commission. And we look forward to those partnerships and we look forward to those grant applications, grant proposals.

## **Slide 40: Sequence of Requirements**

I wanted to conclude with some information on the sequence of requirements; this helps people understand how this all fits together at a requirement level. Here this image runs through the sequence from federal requirements to the local requirements. And so, under federal law and regulation we have WIOA Title II, also known as the

Adult Education and Family Literacy Act. And then those regulations—the joint rules—which govern all WIOA programs and then the Title II-specific rules or regulations. Then we have state law and state rules.

Senate Bill 307 is our authorizing state legislation, and then Texas Labor Code Chapter 800, 802, and 805 which we previewed earlier. The grant and the grant solicitation will include the statement of work, information on what is required of grantees. And then information on how to make contract amendments, performance information, reporting requirements, and expenditure limitations.

Getting to more tactical and granular levels we have what we call Adult Education and Literacy or Workforce Development, AEL and WD Letters. These are official letters that come out providing more guidance on implementation, Workforce Board letters pertaining to Workforce Boards, and general agency requirements. AEL letters pertain to adult education and literacy.

Then other less formal guidance is provided through—technical assistance provided by TWC staff. For example, my staff in the adult education and literacy department. And, locally, standard operating procedures, or SOPs, may govern service delivery at the local level. And in monitoring, monitors from TWC would look at all of these levels of requirements including local SOPs when they come to review programs.

### **Slide 41: Resources**

Back to some of the resources we previewed earlier. Title II regulations are available at this link. The TWC rules Chapter 800, 802, and 805 at the other links provided below for further research.

### **Slide 42: Thank you**

I want to thank you for your time today and we look forward to your partnership in future grants that are solicited through the agency and hopefully you will find success in those grant solicitation processes. I'm Anson Green and thank you very much for listening.