Workforce Innovation Opportunity Act (WIOA), Title II

2025

Providers' Guide and College and Career Readiness Manual

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REVISIONS HAVE BEEN HIGHLIGHTED IN BLUE!

NC COMMUNITY COLLEGES | **COLLEGE & CAREER READINESS**

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CREATING SUCCESS

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The purpose of this Guide is to provide guidance on state and federal policies and procedures related to the operation of WIOA, Title II programs. This Guide is a resource that will be updated on a regular basis and is not intended to be a sole source for information. Use this Guide in conjunction with other available guidance materials such as, staff development, web resources, and targeted technical assistance.

On July 22, 2014, President Obama signed into law the Workforce Innovation and Opportunity Act (WIOA), which revises and reauthorizes the Workforce Investment Act (WIA) of 1998. WIOA is designed to help job seekers access employment, education, training, and support services to succeed in the labor market and to match employers with the skilled workers they need to compete in the global economy. The law brings together, in strategic coordination, four primary Titles with six core programs or partners:

- Title I, Workforce Development Activities, is comprised of three core programs: the Adult, Youth, and Dislocated Worker programs, and is administered by the NC Department of Commerce, Division of Workforce Solutions.
- Title II is Adult Education and Literacy and is administered by the North Carolina Community College System.
- Title III is the Wagner-Peyser Act and is administered by the NC Department of Commerce, Division of Workforce Solutions; and,
- Title IV, Vocational Rehabilitation, or the Rehabilitation Act of 1973, is administered by the NC Department of Health and Human Services, Division of Vocational Rehabilitation Services.

The bipartisan Workforce Innovation and Opportunity Act (WIOA) (Pub. L. 113-128) creates a new vision for how America prepares an educated and skilled workforce that expands opportunity for workers and employers. WIOA represents the most significant reform to our public workforce development system in nearly 20 years. The 21st century public workforce development system created through WIOA builds closer ties between business leaders, State and Local Workforce Development Boards, labor unions,

> **In North Carolina, WIOA, Title II is administered by the North Carolina Community College System (NCCCS) through a competitive application process. The program is housed in the College and Career Readiness unit within the NCC System Office located in Raleigh NC.**

community colleges, nonprofit organizations, youth-serving organizations, and State and local officials. It supports the development of strong regional economies and enhances performance accountability to better inform consumers and investors about programs and services that work. WIOA establishes ambitious goals for the integration of workforce service programs. These goals are intended to maximize the value and benefits to customers of services available to them under federally funded workforce development programs. Included are business customers seeking to acquire the talent and skills needed to compete in a global economy. Also included are program participants seeking to acquire skills and recognized credentials to move along pathways that lead to high-paying jobs in growing sectors of the economy that offer long-term opportunities for stable employment.

THE WORKFORCE INNOVATION AND OPPORTUNITY ACT

Major Points

1. WIOA brings together, in strategic coordination, four primary Titles with six core programs or partners:
   - Title I, Workforce Development Activities, is comprised of three core programs: the Adult, Youth, and Dislocated Worker programs, and is administered in North Carolina by the Department of Commerce, Division of Workforce Solutions.
   - Title II is Adult Education and Literacy and is administered by the North Carolina Community College System.
   - Title III is the Wagner-Peyser Act and is administered by the NC Department of Commerce, Division of Workforce Solutions; and,
   - Title IV, Vocational Rehabilitation, or the Rehabilitation Act of 1973, is administered by the NC Department of Health and Human Services, Division of Vocational Rehabilitation Services.

2. As one of the core partners under WIOA, a representative from the Adult Education and Literacy program has a seat on and is a member of the Local Workforce Development Board in each of the 23 local board areas (WIOA Sec. 107 (b)(2)(C)(i)).
   - As a part of the coordination with education partners, WIOA requires that the Local Workforce Development Board (LWDB) review local applications for Title II: Adult Education and Literacy funding. The LWDB does not approve the application but reviews it to ensure alignment with the Local Plan for workforce development activities under WIOA (WIOA Sec. 107(d)(11)(B)(i)(I)).

3. In addition to being a core partner, Title II: Adult Education and Literacy is also a required partner of the comprehensive One-Stop/American Job Center system, as defined under WIOA Section 121(b).
   - As such, Title II is required to participate in the provision of services and operation of the American Job Center system, as agreed upon in the negotiated Memorandum of Understanding (MOU) developed by each LWDB.
   - As described in WIOA Section 121(c)(2)(A)(ii), shared responsibility for the infrastructure and shared systems costs is one of the requirements of the required American Job Center system partners.
   - The North Carolina Community College System Office and the NC Department of Commerce jointly developed an infrastructure cost agreement at the State level. Each Title II-funded provider has 1.5% of its federal budget deducted for infrastructure costs before the grant award is made.

WIOA Highlights

As a WIOA partner, it is important for Title II providers to understand the broader scope of the legislation. Below are some of the highlights of the Workforce Innovation and Opportunity Act that provide a global view of the intent of the law.

WIOA requires states to strategically align workforce development programs: WIOA ensures that employment and training services provided by the core programs are coordinated and complementary, so that job seekers acquire skills and credentials that meet employers' needs.

- Every State develops and submits a four-year strategy - in the form of a single unified strategic plan for core programs to prepare an educated and skilled workforce, and meet the workforce needs of employers.

For a copy of NC's State plan, visit the <u>North Carolina Department of Commerce</u>

WIOA promotes accountability and transparency: WIOA ensures that investments in employment and training programs are evidence-based, data-driven, and accountable to participants and taxpayers.

- Core programs are required to report on common performance indicators that provide key employment information, such as how many workers entered and retained employment, their median wages, whether they attained a credential, and their measurable skill gains. We will examine performance indicators in the Performance and Accountability chapter of this guide.
- Negotiated levels of performance for the common indicators are adjusted based on a statistical model that considers economic conditions and participant characteristics.
- Performance reports for states, local areas, and eligible training providers will be publicly available.
- Key partners and services will be available at the NCWorks Career Centers through the co-location of the Wagner-Peyser Employment Service and the addition of the Temporary Assistance for Needy Families (TANF) program as a mandatory partner.
- States and local areas are encouraged to improve customer service and program management by integrating intake, case management, and reporting systems.

- Partner programs will dedicate funding for infrastructure and other shared costs. This includes Title II.
- Title II providers should work closely with their local NCWorks Career Centers to determine options for increased coordination of services.

WIOA improves services to employers and promotes work-based training: WIOA contributes to economic growth and business expansion by ensuring the workforce system is job-driven, matching employers with skilled individuals. State and local boards are responsible for activities to meet the workforce needs of local and regional employers.

- State and local boards will promote the use of industry and sector partnerships to address the workforce needs of multiple employers within an industry.
- State and local boards must coordinate and align workforce programs to provide coordinated, complementary, and consistent services to job seekers and employers.
- Title II is a required partner on the local workforce development board.

WIOA provides access to high quality training: WIOA helps job seekers acquire industry-recognized credentials for in-demand jobs.

- Training that leads to industry recognized post-secondary credentials is emphasized.
- States and local areas will use career pathways to provide education and employment and training assistance to accelerate job seekers' educational and career advancement.

WIOA enhances workforce services for the unemployed and other job seekers: WIOA ensures that unemployed and other job seekers have access to high-quality workforce services.

- WIOA service categories of core and intensive services are collapsed into "career services" and there is no required sequence of services, enabling job seekers to access training immediately.
- Job seekers who are basic skills deficient, in addition to those who are low-income individuals, have a priority for services from the adult literacy program.

WIOA encourages services to individuals with disabilities: WIOA increases individuals with disabilities' access to high quality workforce services and prepares them for competitive integrated employment. Youth with disabilities will receive extensive pre-employment transition services, so they can successfully obtain competitive integrated employment.

WIOA makes key investments in serving disconnected youth and other individuals with barriers to employment.

- Under the law, local areas must increase the percentage of youth funds used to serve out-of-school youth to 75 percent from 30 percent.

- Local areas must spend at least 20 percent of youth funds on work experience activities such as summer jobs, pre-apprenticeship, on-the-job training, and internships, so that youth are prepared for employment.

As one of the core partners under WIOA, Adult Education and Literacy programs are encouraged to have a seat on the Local Workforce Development Board or serve as a committee member.

For Local Workforce Development Boards (LWDBs) with multiple Title II-funded providers, the organizations should work together to determine the representative for that local board.

The functions of the LWDB include (WIOA Sec. 107(d)):

1. Develop a local plan for workforce development activities (WIOA Sec. 107(d)(1)).
2. Perform workforce research and local and regional labor market analysis (WIOA Sec. 107(d)(2)).
3. Convene local workforce development system stakeholders in the development of the local plan and leverage support for the plan activities (WIOA Sec. 107(d)(3));
4. Engage employers (WIOA Sec. 107(d)(4)).
5. Develop and implement career pathways programming with partners from secondary and postsecondary education by aligning various education, training, and supportive services (WIOA Sec. 107(d)(5));

> **Regardless of how the member is chosen, the Adult Education and Literacy LWDB member is responsible for representing all Adult Education providers in that LWDB, participating in LWDB meetings and consulting with, and reporting back to, the other providers in the area.**

6. Identify and promote proven and promising practices (WIOA Sec. 107(d)(6));
7. Develop strategies for using technology to maximize the accessibility and efficacy of the local workforce development system (WIOA Sec. 107(d)(7)).
8. Conduct oversight for programs under WIOA Title I and the local comprehensive American Job Center (WIOA Sec. 107(d)(8)).
9. Negotiate local performance accountability measures (WIOA Sec. 107(d)(9));
10. Select operators of the American Job Center, providers of youth services, and eligible providers of training and career services (WIOA Sec. 107(d)(10)).

11. Coordinate with local education providers, including Title II: Adult Education and Literacy providers, Career and Technical Education (CTE) providers as defined in section 3 of the Carl D. Perkins Career and Technical Education Act of 2006, and local agencies administering plans under Title I of the Rehabilitation Act of 1973 (29 U.S.C. 732, 741) (WIOA Sec. 107(d)(11)).
    a. As a part of the coordination with education partners, WIOA requires that the LWDB review local applications for Title II: Adult Education and Literacy funding. The LWDB does not approve the application but reviews it to ensure alignment with the Local Plan for workforce development activities under WIOA (WIOA Sec. 107(d)(11)(B)(i)(I)).
12. Develop the operating budget for the Work Force Development Board and administer the operation of the LWDB (WIOA Sec. 107(d)(12)); and
13. Assess the physical and programmatic accessibility of all American Job Centers within the LWDB, in accordance with WIOA Section 188 and the Americans with Disabilities Act of 1990 (ADA) (42 U.S.C. 12101 et seq.) (WIOA Sec. 107(d)(13)).

Comprehensive American Job Center/ NCWorks Participation

Memorandum of Understanding: In addition to being a core partner, Title II is also a required partner of the comprehensive one-stop system referred to as the American Job Center, as defined under WIOA Section 121(b). In North Carolina, the American Job Center system is called NCWorks Career Centers. As such, Title II is required to participate in the provision of services and operation of the American Job Center system, as agreed upon in the negotiated Memorandum of Understanding (MOU) developed by each LWDB. The MOU governs the operation of the comprehensive American Job Center system and includes provisions describing:

- The services to be provided through the American Job Center delivery system, including the way the services will be coordinated and delivered (WIOA Sec. 121(c)(2)(A)(i)).
- How the costs of such services and the operating costs of the system will be funded, including:
    - Funding through cash and in-kind contributions, with may include funding from philanthropic organizations or other private entities or through other alternative financing options (WIOA Sec. 121(c)(2)(A)(ii)(I)); and
    - Funding of the infrastructure costs of American Job Centers (WIOA Sec. 121(c)(2)(A)(ii)(II);
- Methods of referral of individuals between the American Job Center operator and partners (WIOA Sec. 121(c)(2)(A)(iii)).
- Methods of ensuring accessibility and availability to necessary and appropriate services to all individuals, including individuals with disabilities, those with barriers to employment, and youth (WIOA Sec. 121(c)(2)(A)(iv)).
- The duration of, and procedures for amending, the MOU; and
- Any other provisions, consistent with the requirements of WIOA Title I, as deemed appropriate by the parties to the agreement (WIOA Sec. 121(c)(2)(B)).

Infrastructure Costs: As described in (WIOA Section 121(c)(2)(A)(ii), shared responsibility for the infrastructure and shared systems costs is one of the requirements of the American Job Center system partners. Infrastructure costs of American Job Centers are non-personnel costs that are necessary for the general operation of the center, including:

(1) Rental of the facilities.
(2) Utilities and maintenance.
(3) Equipment (including assessment-related products and assistive technology for individuals with disabilities); and
(4) Technology to facilitate access to the American Job Center, including technology used for the center's planning and outreach activities.

TITLE II: WORKPLACE AND FAMILY LITERACY ACT

Major Points

1. There are three grants available under Title II AEFLA. They are (1) WIOA, Title II, Section 231 – Adult Education and Family Literacy Act (AEFLA); (2) WIOA, Title II, Section 243 – Integrated English Literacy and Civics Education; and WIOA, Title II, Section 225 – Correctional Education and Other Institutionalized Individuals.

2. The NCCCS provides a direct and equitable opportunity for eligible providers to request Title II funds by submitting a written application to develop, implement, and improve adult education and literacy activities in North Carolina.

3. Allowable activities include adult education, literacy, workplace adult education and literacy, family, English language acquisition, integrated English literacy and civics education, workforce preparation, and integrated education and training.

4. Title II–funded programs are required to implement the 13 Considerations into their program operations. These 13 considerations are also used in the program application, so applicants can describe how each consideration will be addressed.

5. Allowable Title II costs include instructional expenditures related to programs and services addressing allowable activities. Examples include salary, wages, and benefits for instructional personnel; textbooks and instructional supplies; and instructional equipment.

6. Administrative costs are non-instructional in nature and do not directly relate to program costs. They cannot exceed 5% of the Federal allocation. They can include administrative costs (e.g., clerical support); indirect costs (e.g., classroom space, rent, utilities); and American Job Center infrastructure costs (1.5% of your federal allocation is deducted by the NCCCS to cover this requirement before allocations are received.) Administrative costs are unallowable with State funds. Neither Federal nor State matching funds may be used for GED, HiSet or TASC test administration.

7. As part of the Federal compliance process, the System Office is required to conduct a Risk Assessment on each provider before grant funds can be awarded.

Title II - Adult Education and Family Literacy Act Overview

WIOA strengthens the Title II - Adult Education and Family Literacy Act (AEFLA) program by positioning adult education services as a key component of the workforce development system in local communities and improving alignment among adult education programs, postsecondary education providers, and employers. A summary of WIOA's key features include:

- **Transition from adult basic education to postsecondary education, postsecondary training, or employment:** While AEFLA continues to emphasize high school completion for youth and adults, WIOA reauthorized AEFLA in a manner that recognizes that completion of high school is not an end, but a means to further opportunities and greater economic self-sufficiency. Through the implementation of new activities such as integrated education and training, workforce preparation activities, and career pathways programming, changes will better support individuals as they transition from adult basic education to postsecondary education, postsecondary training, or employment.
- **English language learning:** Through WIOA, AEFLA now formalizes the role that adult education has played for decades related to assisting immigrants and English language learners in learning to read, write, and speak English, adds mathematics to the scope of services, and expands the focus of English language learning by adding civics education and workforce training.
- **Innovative supports for re-entry:** Drawing on growing research on the long-term value of education in reducing recidivism and promoting successful re-entry into society, AEFLA, as reauthorized by WIOA, encourages innovative programming for the educational and career advancement of incarcerated individuals.
- **Supports for families and communities:** As reauthorized by WIOA, the purpose of AEFLA continues to emphasize the important role that adult education and literacy plays in supporting the educational and skill achievement of parents and family members to participate in the educational development of their children and improve economic opportunities for their families.

Allowable Activities

WIOA, Title II authorizes a variety of allowable activities including:

- Adult education,
- Literacy,
- Workplace adult education and literacy,
- Family literacy.
- English language acquisition,
- Integrated English literacy and civics education,
- Workforce preparation, and
- Integrated education and training.

Each activity is summarized below.

ADULT EDUCATION - academic instruction and education services below the postsecondary level that increase an individual's ability to:

(A) Read, write, and speak in English and perform mathematics or other activities necessary for the attainment of a secondary school diploma or its recognized equivalent.
(B) Transition to postsecondary education and training; and
(C) Obtain employment.

LITERACY - an individual's ability to read, write, and speak in English, compute, and solve problems, at levels of proficiency necessary to function on the job, in the family of the individual, and in society.

WORKPLACE ADULT EDUCATION AND LITERACY - includes adult education and literacy activities designed in collaboration with an employer or employee organization at /a workplace or an off-site location that is designed to improve the productivity of the workforce.

FAMILY LITERACY - activities that are of sufficient intensity and quality, to make sustainable improvements in the economic prospects for a family and that better enable parents or family members to support their children's learning needs, and that integrate all the following activities:
(A) Parent or family adult education and literacy activities that lead to readiness for postsecondary education or training, career advancement, and economic self-sufficiency.
(B) Interactive literacy activities between parents or family members and their children.
(C) Training for parents or family members regarding how to be the primary teacher for their children and full partners in the education of their children.
(D) An age-appropriate education to prepare children for success in school and life experiences.

ENGLISH LANGUAGE ACQUISITION - a program of instruction—
(A) Designed to help eligible individuals who are English language learners achieve competence in reading, writing, speaking, and comprehension of the English language; and
(B) That leads to attainment of a secondary school diploma or its recognized equivalent and transition to postsecondary education and training or employment.

INTEGRATED ENGLISH LITERACY AND CIVICS EDUCATION - education services provided to English language learners who are adults, including professionals with degrees and credentials in their native countries, that enables such adults to achieve competency in the English language and acquire the basic and more advanced skills needed to function effectively as parents, workers, and citizens in the United States. Such services shall include instruction in literacy and English language acquisition and instruction on the rights and responsibilities of citizenship and civic participation and may include workforce training.

WORKFORCE PREPARATION - activities, programs, or services designed to help an individual acquire a combination of basic academic skills, critical thinking skills, digital literacy skills, and self-management skills, including competencies in utilizing resources, using information, working with others, understanding systems, and obtaining skills necessary for successful transition into and completion of postsecondary education or training, or employment.

INTEGRATED EDUCATION AND TRAINING - an instructional model that provides adult education and literacy activities concurrently and contextually with workforce preparation activities and workforce training for a specific occupation or occupational cluster. An integrated education and training program must meet all the following criteria to be allowable under Title II:

- It must include all three components: adult basic education, workforce preparation activities, and occupational training.
- All three components must occur simultaneously, be of sufficient intensity and quality, be research based, and use occupationally relevant instructional materials.
- The program must have a single set of learning objectives that identifies specific adult education content, workforce preparation activities, and workforce training competencies, and the program activities must be organized to function cooperatively.
- The integrated education and training program must be part of a career pathway and help an individual enter or advance in an occupation or occupational cluster.
- The adult basic education instruction must be aligned with the College and Career Readiness Standards, provide skills that are transferable to other contexts and situations, and prepare participants to succeed in any employment and/or postsecondary education opportunities.

- The occupational training component of the program must align with the skill needs of business in the area and existing, high-quality employment opportunities for participants.
- Concurrent Enrollment: Per IELCE program rules, Integrated Education and Training (IET) models must provide adult education instruction simultaneously with workforce preparation activities and workforce training (also known as occupational skills training). As all program components must be delivered concurrently, the workforce training services must be delivered in the same week as course(s) delivering adult education and literacy services and workforce preparation activities. IETs in IELCE 243 programs must also deliver civics participation and citizenship preparation instruction as part of adult education instruction.

Title II- Grant Funding

There are three grants under Title II AEFLA. They include:

1. Adult Education & Family Literacy (AEFLA - Section 231)
2. Integrated English Literacy and Civics Education (Section 243)
3. Federal Correctional Education (Section 225)

The following pages provide a brief description of the three grants.

Federal Adult Education and Family Literacy (Section 231)
Purpose
Assist adults to become literate and obtain the knowledge and skills necessary for employment and self-sufficiency.   **Assist adults who are parents to obtain the educational skills necessary to become full partners in the educational development of their children, and lead to sustainable improvements in the economic opportunities for their families.**   **Assist adults in attaining a secondary school diploma and in the transition to postsecondary education and training, through career pathways; and**   **Assist immigrants and other individuals who are English language learners in—**   **Improving their reading, writing, speaking, and comprehension skills in English and mathematics skills; and**   **Acquiring an understanding of the American system of Government, individual freedom, and the responsibilities of citizenship.**
Eligible Participants
Adult Education means instruction and support services below the postsecondary level for individuals: **who have attained 16 years of age;**   **who are not enrolled or required to be enrolled in secondary school under State law; and**   **basic skills deficient; or**   **does not have a secondary school diploma or its recognized equivalent level or education; or**   **is an English language learner.**   **No additional criteria may be used to determine student eligibility. Students are placed in the appropriate leveled classes with an in-range score on an NRS approved assessment. Please refer to the NC CCR Assessment Manual and to the test manufacturers' guidelines for further guidance.**
Allocation Method

Title II WIOA funds for AEFLA are distributed by the NCCCS according to a formula adopted by the SBCC on February 16, 2018. These funds are intended to supplement an organization's adult education activities. The formula has 3 components:

1. **Base:** 15% of available funding is allocated equally across providers. The base component is available to all providers.
2. **Access:** 50% of available funding is allocated for access. Access is determined by contact hours of participants within 3 weighted tiers:

   Tier A – Weight 5: Beginning Adult Basic Education Literacy, Beginning Adult Basic Education, Beginning English as a Second Language (ESL) Literacy, Beginning ESL
   Tier B - Weight 4: Low Intermediate ESL, High Intermediate ESL, Low Advanced ESL, High Advanced ESL, Low Intermediate Adult Basic Education, High Intermediate Adult Basic Education
   Tier C – Weight 3: Adult Secondary Education Low, Adult Secondary Education High

3. **Performance:** 35% of available funding is allocated for performance. Performance allocations are determined by the number and percentage of basic skills participant periods of participation with a measurable skills gain (MSG). (Under federal regulations, a period of participation begins when a participant enters the program and does not end until a participant exits the program. If a student has 12 or more contact hours during this time, the student is classified as a participant within a period of participation. Measurable skills gains are required by WIOA and are used to demonstrate participants' progress toward achieving a credential or employment.) An MSG is associated with gain in educational functional level, completion of adult high school credits, attainment of a high school equivalency credential, and postsecondary education enrollment.

State match for Section 231: Section 231 Federal funds are matched with State and Performance funds. Federal funding regulations (Education Department General Administrative Regulations (EDGAR) and Uniform Guidance) apply to the combination of both State and Federal funds. Other sources of Federal funds cannot be used. Community-Based Organizations are required to provide a 40% match from funds other than Federal.

Federal Integrated English Literacy and Civics Education (Section 243)
Purpose
Provided in combination with integrated education and training activities and designed to: (1) Prepare adult English language learners for, and placement in, unsubsidized employment in high demand industries and occupations that lead to economic self-sufficiency; and (2) Integrate with the local workforce development system and its functions to carry out the activities of the program.
Eligible Participants
English language learners who: • have attained 16 years of age. • are not enrolled or required to be enrolled in secondary school under State law; and • have limited ability in reading, wiring, speaking, or comprehending English language, and

- **have a native language other than English, or**
- **live in a family or community environment where a language other than English is the dominant language.**
- **No discriminatory criteria may be applied to student eligibility. All individuals who meet the criteria listed within the law must be served.**

Allocation Method

Title II WIOA Section 243 funds are distributed by the North Carolina Community College System according to a formula adopted by the SBCC in July 2019. The formula has three components:
1. **Base: 70% of available funding is allocated equally across providers.**
2. **Participation: 10% of available funding is allocated based on the provider's share of participants. That share is multiplied by a dedicated allotment to determine provider allocation. Participant is defined as an individual in a Title II program who has received at least 12 hours of service in a Period of Participation (POP).**
3. **Performance: 20% of available funding is allocated based on the provider's share of Measurable Skill Gains (MSGs). That share is multiplied by a dedicated allotment to determine provider allocation.**

Federal Correctional Education (Section 225)

Purpose

To provide a range of adult education and literacy programming designed to assist criminal offenders and other institutionalized individuals with re-entry efforts into the workforce.

Eligible Participants

Criminal offenders who reside in correctional institutions and other institutionalized individuals such as persons who reside in facilities operated by a State mental health agency or individuals in civil confinement institutions. WIOA requires that eligible agencies that are using funds to carry out a program for criminal offenders in a correctional institution give priority to serving individuals who are likely to leave the correctional institution within 5 years of participation in the program.

Allocation Method

Title II WIOA Section 225 funds are distributed by the NC Community College System according to a formula adopted by the SBCC in July 2019. The formula has 3 components:
1. **Base: 30% of available funding is allocated equally across providers.**
2. **Participation: 30% of available funding is allocated based on the provider's share of participants. That share is multiplied by a dedicated allotment to determine provider allocation. Participant is defined as an individual in a Title II program who has received at least 12 hours of service in a Period of Participation (POP).**
3. **Performance: 40% of available funding is allocated based on the provider's share of Measurable Skills Gains (MSGs). That share is multiplied by a dedicated allotment to determine provider allocation.**

Thirteen Considerations for WIOA Title II

Title II legislation includes 13 considerations or practices that are expected to be implemented in every funded program. These include the following:

1. The degree to which the eligible provider would be responsive to (A) regional needs as identified in the local plan under section 108 and B) serving individuals in the community who were identified in such plan as most in need of adult education and literacy activities, including individuals-(i) who have low levels of literacy skills; or (ii) who are English language learners.
2. The ability of the eligible provider to serve eligible individuals with disabilities, including eligible individuals with learning disabilities.
3. Past effectiveness of the eligible provider in improving the literacy of eligible individuals, to meet State-adjusted levels of performance for the primary indicators of performance described in section 116.
4. The extent to which the eligible provider demonstrates alignment between proposed activities and services and the H. R. 803-195 strategy and goals of the local plan under section 108, as well as the activities and services of the American Job Center partners.
5. Whether the eligible provider's program- (A) is of sufficient intensity and quality and based on the most rigorous research available so that participants achieve substantial learning gains; and (B) uses instructional practices that include the essential components of reading instruction.
6. Whether the eligible provider's activities, including whether reading, writing, speaking, mathematics, and English language acquisition instruction delivered by the eligible provider, are based on the best practices derived from the most rigorous research available and appropriate, including scientifically valid research and effective educational practice.
7. Whether the eligible provider's activities effectively use technology, services, and delivery systems, including distance education in a manner sufficient to increase the amount and quality of learning and how such technology, services, and systems lead to improved performance.
8. Whether the eligible provider's activities provide learning in context, including through integrated education and training, so that an individual acquires the skills needed to transition to and complete postsecondary education and training programs, obtain and advance in employment leading to economic self-sufficiency, and to exercise the rights and responsibilities of citizenship; include the essential components of reading instruction.
9. Whether the eligible provider's activities are delivered by well-trained instructors, counselors, and administrators who meet any minimum qualifications established by the State, where applicable, and who have access to high quality professional development, including through electronic means.
10. Whether the eligible provider's activities coordinate with other available education, training, and social service resources in the community, such as by establishing strong links with elementary schools and secondary schools, postsecondary educational institutions, institutions of higher education, local workforce investment boards, American Job Centers, job training programs, and social service agencies, business, industry, labor organizations, community-based organizations, nonprofit organizations, and intermediaries, for the development of career pathways;
11. Whether the eligible provider's activities offer flexible schedules and coordination with Federal, State, and local support services (such as childcare, transportation, mental health services, and career planning) that are necessary to enable individuals, including individuals with disabilities or other special needs, to attend and complete programs.
12. Whether the eligible provider maintains a high-quality information management system that has the capacity to report measurable participant outcomes (consistent with section 116) and to monitor program performance.
13. Whether the local areas in which the eligible provider is located have a demonstrated need for additional English language acquisition programs and civics education programs.

Title II Competitive Funding Process

The North Carolina Community College System provides an opportunity for eligible providers to request Title II funds by submitting a written application to develop, implement, and improve adult education and literacy activities in North Carolina.

Eligible Providers: Eligible Title II providers include:
  A. A local educational agency.
  B. A community-based organization.
  C. A volunteer literacy organization.
  D. An institution of higher education.
  E. A public or private nonprofit agency.
  F. A library.
  G. A public housing authority.
  H. A nonprofit institution that is not described in any of subparagraphs (A) through (G) and has the ability to provide adult education and literacy activities to eligible individuals.
  I. A consortium or coalition of the agencies, organizations, institutions, libraries, or authorities described in any of the subparagraphs (A) through (H); and
  J. A partnership between an employer and an entity described in any of subparagraphs (A) through (I).

As required by WIOA, funding is prioritized for the following:
  • Organizations who have demonstrated effectiveness in improving the literacy of eligible individuals especially with respect to eligible individuals, who have low levels of literacy.
  • Organizations whose services are aligned with local workforce strategies, priorities, and partners; and
  • Organizations whose services are responsive to the needs of persons with barriers to employment.

Grant period: Grants are awarded for a four-year period. Funding in second and subsequent years may be dependent on continued appropriations and provider meeting all grant, fiscal, and reporting requirements.

Direct and equitable: The NCCCS provides direct and equitable access to Title II funds for eligible providers that are located in North Carolina.
1) All eligible providers will have direct and equitable access to apply and compete for grants.
2) The same grant announcement and application processes are used for all eligible applicants.

Post Allocation Budget

Upon approval of allocations, the provider will receive a packet of materials including Form 2-34 which will be used to submit the Federal and State budget. If the provider's allocation is different than what was submitted on the planning budget, the provider will need to make adjustments to reflect the final allocation. Remember:
  • The budget must display calculations for each detailed line item.
  • The budget must have two signatures to include the Chief Fiscal Officer and the Chief Administrative Officer. The chief administrative officer can be the Basic Skills/Title II director.
  • The budget should be saved in PDF and submitted via the Moodle® portal to the System Office.

Fiscal Responsibilities

Expenditures for each Federal funding source must be tracked separately within an individual budget. Federal and State funds are restricted purpose funds and may not be transferred to other grants or purposes. Records must be maintained to support the appropriate usage of Adult Education and Literacy

funds. Amounts reported as expenditures must be for allowable activities and services and must reflect actual expenditures.

Title II recipients are responsible for ensuring that grants are managed with sound fiscal systems and procedures that meet applicable State and Federal requirements. The provider:

- Is responsible for effective management of the grant, including all funds committed to subcontractors.
- Must have appropriate accounting systems in place to track expenditures, including responsibility for monitoring subcontracts and ensuring that all grant funds are expended as articulated in the Memorandum of Agreement between partners.
- Must maintain a time and effort record for each staff person that reflects appropriate alignment among the hours worked on the grant, the hours allocated in the program plan, and the payroll.
- Providers are required to report deviations from the budget or project scope on the Budget Transfer Form: NCCCS 2-36. Federal award recipients must specifically request prior approval if any of the following occur:
  - Transfers of 10% or more of the overall budget
  - Change in scope or objective of the project or program
  - Change in key personnel specified in the application or Federal award
  - Disengagement from the project for more than three months or a 25% reduction in time
  - Transfer from costs associated with serving students to other categories of expense
  - Transferring or contracting out any work.
- Must submit required fiscal reports by the deadline established by the NCCCS. Failure to submit timely and accurate reports may result in a suspension of further payments.
- Must retain all local program records and supporting documents for a minimum of five years from the date of submission of the final expenditure report.

Funding Disbursement and Expenditures

Community-based organizations will submit requests for reimbursement against the budget from Form NCCCS 2-33 for actual expenditures by the 5th working day of each month. Failure to do so may result in risk of nonpayment or suspension of funding. Each reimbursement request must be submitted with a line-item spending report corresponding to the amounts being requested for reimbursement.

Community colleges will submit expenditure reports monthly via the NCCCS XDBR report.

All procurement must follow NCCCS procurement guidance issued in NCCCS fiscal and budgetary guidelines to be issued by NCCCS.

The provider must retain all local program records and supporting documents for a minimum of five years from the date of submission of the final expenditure report.

Allowable Uses of Federal Funds

The Education Department of General Administrative Regulations (EDGAR) addresses allowable uses of Federal grant funds. All grant recipients must have a financial management system that includes written procedures for ensuring all expenditures conform to the terms and conditions of the grant as well as the Uniform Guidance Cost Principles. All grant costs must:

- Be necessary and reasonable
- Be consistent with policies and procedures
- Be treated consistently
- Be aligned with the Generally Accepted Accounting Principles (GAAP)
- Be adequately documented

- Not be included for match or cost sharing
- Conform with Federal law and grant terms

The provider must maintain a record of actual expenditures of local, State, and Federal funds for activities allowed under WIOA Title II. The funds must be maintained as separate line items to maintain their separate identities for reporting and auditing purposes. Comingling of these separate sources of funding is not allowed.

Title II allowable costs fall into two categories: direct costs and administrative/indirect costs.

Direct costs: Direct costs are expenditures assigned to a specific project or activity that support the program's instructional purpose. Examples include salary, wages, and benefits for instructional personnel; textbooks and instructional supplies; and instructional equipment. Anything dealing with direct instruction is an allowable direct cost including professional development costs.

Equipment is tangible personal property having a useful life of more than one year and per unit cost which equals or exceeds $5,000. Prior approval is required to purchase equipment. Supplies are all tangible personal property with a per unit cost which is less than $5,000 regardless of the length of its useful life.

Administrative/indirect costs: These costs are non-instructional in nature and **cannot exceed 5% of your federal allocation.** They can include:

- Administrative costs (e.g., clerical support and administrative functions. This could include a percentage of a director's salary if other duties are directly related to instructional support.)
- Indirect costs (e.g., classroom space, rent, utilities)
- American Job Center infrastructure costs (1.5% of your federal allocation is removed by the System Office to cover this requirement before you receive your allocation.)

A provider may request to negotiate an increase in the 5% cap. This request must be in writing with a detailed rationale explaining why the additional administrative cost is necessary and how the additional administrative funds shall be spent. The request may or may not be approved.

Unallowable costs:

- No State funds may be used for administrative/indirect costs.
- No Federal or State FTE generated funds may be used for GED, HiSET, or TASC test administration that are part of the federal match.
- No Federal funds may be used to purchase any promotional items such as pencils, luggage tags, hats, etc. However, State funds may be used if the items are "program-specific." For example, you could use State funds to purchase a pencil that has your specific program's name and logo. Advertising is a very limited cost that requires prior approval.
- No State or Federal funds may be used to travel outside the country; prior approval for travel outside the State should be obtained by virtue of inclusion in the local plan/application.
- Other unallowable costs include such items as commencement costs, advisory councils, food, lobbying, flowers, gifts, trophies, awards, and student activity costs.
- All purchases over $5,000 must follow the State purchasing guidelines.

Supplement – not supplant: State and other non-Federal funding sources should not be replaced by AEFLA Federal funding. The AEFLA funds should be used to supplement and increase the level of funds made available to adult education programs. Federal funds may not be used to pay for services, staff, programs, or materials that would otherwise be paid with State or local funds.

Unexpended Funds

It is particularly important to monitor expenses to ensure that funds are used within the fiscal year. State regulations provide no flexibility for use of funds after June 30 of the program year. The State Office will monitor programs periodically throughout the program year to assess each agencies risk of not expending the Title II funds in a timely manner. If providers are unable to expend their agency's Title II funds by the end of the program year, the unexpended funds will revert to the North Carolina Community College System Office.

Time and Effort Reporting

Staff who are paid out of a federal grant award in full or partially, or out of matching funds to that award, must report their time and effort to the responsible funding agency, North Carolina Community College System (NCCCS) Office.

What is Time and Effort reporting?
Time and effort reports show how salary and wages are charged to Federal grant awards.
Therefore, all providers that receive a federal grant award must keep documentation on-site that:

- Documents the employee's time in writing
- Reflects the actual time spent by the employee on activities of the Federal program(s) being charged.
- Covers not more than one month.
- Accounts for all the employee's time for the period covered.
- Be signed by the employee and supervisory official having firsthand knowledge of the work performed by the employee.
- Information kept and maintained on-site is used to prepare time and effort reports, which are to be submitted to the System Office.
- Should document activities performed "after-the-fact."

> **Bottom line: If the employee is involved in a single activity with a fixed schedule or a single grant with a fixed schedule, the employee can submit the semi-annual Time and Effort report.**

Who needs to submit a Time and Effort Report?
Time and Effort reports should be prepared for any employee (full or part time) with salary and wages that are charged:

- Directly to a Federal award,
- Directly to multiple Federal awards or,
- Directly to any combination of a federal award and other Federal, State, or local fund sources used as matching funds.

When are Time and Effort Reports submitted to the System Office?
Employees will complete either a semi-annual (every six months) or monthly Time and Effort report, based on their assigned activities. Monthly reports are due by the 15th working day of each month. Semi-annual reports must besubmitted by the 15th working day of the month in January and again in July. In this scenario, each report documents the activities performed during the six month period. A comparison of the two types of reports is provided on the next page.

	Semi-Annual Time and Effort	Monthly Time and Effort
Factors	Salary and wages are charged directly to a single Federal award (grant) OR to a single cost objective (e.g., work on a single program or on a single type of activity such as teaching or curriculum development).	Salary and wages are paid from multiple Federal awards or multiple cost objectives; employee works on more than one Federal award, a Federal award and a non-Federal funds, or two or more activities paid out of one or more Federal grant awards. Suitable documentation should be maintained to support the Personal Activity Report (PAR) such as a weekly schedule, contract, or time sheet used for budgeting, salary, and wage payments. A PAR must be submitted that: - Reflects an after-the-fact distribution of the actual activity of the employee. - Accounts for the total activity for which each employee is compensated from Federal and non-federal funding sources. - Be prepared at least monthly and coincide with one or more pay periods. - Be signed by the employee and immediate supervisor.
Examples	**Single Cost Objective Examples:** - If an instructor is paid 50% out of 231 funds and 50% out of 243 funds to teach at an employer location, teaching Basic Skills is a "single cost objective." The "single cost objective" for this example is teaching. - A Basic Skills employee teaches Adult Secondary Education (ASE) classes, coordinates English Language Acquisition (ELA) classes, and develops curriculum for Adult Basic Education (ABE) classes. This employee's salary is	**Multiple Cost Objective Examples:** - A Basic Skills director is paid 100% out of local institutional funds and, as a result, cannot use the single cost objective Federal time and effort sheet. This director will need to fill out a monthly time and effort sheet even though 100% of the time is funded by one source. The source of funds would be reported as "other." - A Basic Skills instructor works 80% of the time teaching ASE level classes and 20% of the time teaching developmental studies English. This employee needs to fill out the monthly form to indicate the hours and percent of time both assigned and actually spent on each funding source.

	Semi-Annual Time and Effort	**Monthly Time and Effort**
	paid completely from a single grant (either 231 or 243). This "single cost objective" is, therefore, a grant.	
Reporting Deadlines	Forms should be submitted via the <mark>College & Career Readiness Moodle Portal</mark> at https://learn.cord.org/ Reports are due on January 15th and July 15th of each year.	Forms should be submitted via the <mark>College & Career Readiness Moodle Portal</mark> https://learn.cord.org/ These reports are due by the 15th day in the month after the activities are performed.

Short-Term Substitutes: For short-term work that is charged to a grant, such as short-term substitute teachers, substitute paraprofessionals, extended contract time, etc., the approved time sheet or similar type of documentation would suffice as appropriate time and effort reporting. The semi-annual form furnished by the NCCCS Office should not be submitted by short-term employees. All supervisory staff should keep timesheets and other suitable documentation on file locally for backup in these cases.

Time and Effort Monitoring: Payroll records must be compared to the submitted time-and-effort reports on at least a quarterly basis.

- If the difference is 10% or more, payroll charges must be adjusted at the time of the records comparison. The next quarter's estimates must be adjusted to more closely reflect the actual activity. This review process is intended to reconcile time and effort with payroll records.
- If the anticipated time and effort is less than 10% different from the actual time and effort, an accounting adjustment is not required until the end of the program year.
- All time and effort reporting discrepancies are to be reconciled at the end of the program year. Reconciled discrepancies should be reflected in the final report submitted to the System Office at the end of the program year.

Each quarter, random verification of Time and Effort reporting compliance will be conducted by the System Office. A provider's failure to comply with Time and Effort reporting will be addressed in a corrective action plan.

Monitoring Procedures

Risk Assessment:

As part of the Federal compliance process, the System Office is required to conduct a Risk Assessment on each provider before grant funds can be awarded. As the pass-through entity, the North Carolina Community College System (NCCCS) Office must assess the risk of a sub-grantee not complying with Federal statues, regulations and the terms and conditions of sub-awards.

The purpose of this assessment is to furnish the NCCCS State staff with information which will help in monitoring potential risk factors associated with grants awarded to providers. These risk factors are based on Federal guidelines. The focus of the Risk Assessment is to ensure that providers adhere to the grantor's guidelines and agreements, remain within the budget, can implement the scope of service, and ensure that proper internal controls are in place.

A risk assessment for eligible sub-grantees will be performed by the NCCCS Office on an annual basis prior to grant award disbursements. Risk factors will include, but will not be limited to:

- Audit Findings
- New Key Personnel
- Prior Experience
- Performance
- Size and complexity of program
- Late Reporting
- Allocation Amount
- Overpayments/Refunds
- Data Submission Errors
- Lapsed Funds/Carryover Amounts
- Financial Distress
- Indications of Fraud and Abuse
- Impending Provider closures

Upon completion of the risk assessment, all providers will be classified as high, moderate or low risk. Each level of risk will have various levels of programmatic and fiscal monitoring that will be implemented during the program year.

Technical Assistance and training will be provided during the program year to help mitigate and alleviate some of the factors that constitute as risk. All Providers will receive information about the information sessions that will be facilitated via the System Office Compliance team.

Comprehensive Monitoring:

The purpose of monitoring is to ensure that local providers meet Adult Education and Family Literacy Act (AEFLA) requirements, improve the quality of federally funded activities, provide assistance in identifying and resolving Title II accountability problems, ensure the accuracy, validity, and reliability of data collection and data reporting as well as policies and procedures for program accountability. The monitoring cycle covers the current program year for providers funded by (231) AEFLA, (225) Corrections Education, and (243) Integrated English Literacy and Civics Education (IELCE). The different types of programmatic and fiscal monitoring may include:

- On-site Monitoring
- Desktop Monitoring
- Submission of Additional Documentation
- Required Attendance at Trainings/Technical Assistance

Please see the Title II Monitoring Procedures Manual and the Title II Monitoring Checklist for further information.

Levels of Programmatic and Fiscal Monitoring:
Continuous Monitoring:
- o Required for all Providers
- o Monthly and/or Semi-annual Time and Effort Report
- o Monthly XDBR or Request for Reimbursement (CBO)

Comprehensive Onsite Monitoring:
- o Conducted based on Risk assessments
- o Requires pre-onsite activities
- o Divided into five (5) modules based on the 13 Considerations

As a requirement of the Federal award, the pass-through entity, which in this case would be the NCCCS Office and auditors are to have access to the sub-grantees' records and financial statements as necessary for the pass-through entity to meet the requirements. In most circumstances, the Chief Financial Officer (CFO) of the institution will have all the required financial documentation. Documents that should be available for review may include:
- General Ledger Chart of Accounts
- Prior Year General Ledger that includes monthly expenditures
- Payroll information to document the staff paid out of the Federal award
- Time and Effort Documentation
- Cash Management Procedure
- Allowable Procedures
- Travel Policy
- Procurement Procedure

Corrective Action Plan

Upon completion of the monitoring, a Corrective Action Plan (CAP) may be required to resolve the issues located during the evaluation. The Provider will be required to submit a plan detailing how the incorrect programmatic and/or fiscal practices will be amended within the required time frame. If there are unresolved CAP(s), further action may be taken to include specific award conditions/restrictions.

If the provider is placed on a Corrective Action Plan (CAP), the provider will have thirty (30) business days to respond in writing.
- o All CAPs will be uploaded to the Moodle website.
- o A member of the monitoring team will conduct monthly meetings with the provider until the CAP has been satisfied.

Providers that are not placed on a CAP will have thirty (30) days to respond to the commendations and recommendations section of the report.

Fiscal Audits

Providers that receive $750,000 or more in Federal funds are required to have an outside entity conduct an A-133 audit on an annual basis. An A-133 audit examines compliance with the regulations governing the use of Federal funds by grant sub-recipients of Federal funds. Providers that do not receive $750,000 or more in Federal funds are not subject to the specific A-133 audit. Providers must submit either the most recent A-133 or an annual audit electronically with the grant continuation documents. All providers should maintain audit records on file for possible review.

STUDENT ELIGIBILITY, ENROLLMENT AND ATTENDANCE

Major Points
1. Title II includes services or instruction below the postsecondary level for individuals who have attained 16 years of age; who are not enrolled or required to be enrolled in secondary school under State law; and who are basic skills deficient; or do not have a secondary school diploma or its equivalent and have not achieved an equivalent level of education; or are English language learners.
2. Students who have a high school diploma, a high school equivalency, or an Adult High School diploma may enroll in Title II programs if they have a state-approved alternate placement or score 12.9 or below (or its equivalent) on a state-approved standardized test, even if they are enrolled in curriculum programs and require Developmental Studies courses, or remediation.
3. State and Federal requirements do not require that minor students should have a waiting period before their enrollment. Minors withdrawn within a six-month period must obtain a signed official withdrawal form from the local public or private educational agency and a notarized petition of the minor's parent, legal guardian, or other person or agency having legal custody and control.
4. Title II programs may <u>not</u> serve foreign students studying in the United States on F-1 (Student) or J-1 (Study-Exchange) Visas.
5. Title II providers must have a system in place for recording, validating, and reporting student attendance hours. This should include sign-in sheets or electronic attendance systems that verify the time the student entered and exited the instructional activity on a daily basis. Hours are then input into the student information system database, ADVANSYS, no less than weekly, where they are reviewed and approved for reporting, within a week of entry.

Student Eligibility

WIOA defines the services and target population for Title II programs as "services or instruction below the postsecondary level for individuals

(A) who have attained 16 years of age.

(B) who are not enrolled or required to be enrolled in secondary school under State law; and

(C) who –

    (i)   Are basic skills deficient; or

    (ii)   Do not have a secondary school diploma or its equivalent, and have not achieved an equivalent level of education; or

    (iii)   Are English language learners.

Below are a few clarifications regarding student eligibility.
Withdrawal from Secondary School
No student who is currently enrolled in a public or private secondary school may be enrolled in Title II programs.

Enrollment of High School Graduates
Students who have a high school diploma, a high school equivalency, or an Adult High School diploma may enroll in Title II programs if they have a state-approved alternate placement or score 12.9 or below (or its equivalent) on a state-approved standardized test.

Social Security Numbers
Programs are encouraged to obtain social security numbers from students upon enrollment because these are used to data-match employment, high school credential, and postsecondary outcomes, helping to demonstrate how Title II Providers fulfill their role in the workforce development system. However, services **cannot** be denied if the student does not provide the program with their social security numbers.

Enrollment of Special Populations

MINORS

Minors are defined as individuals 16 – 17 years of age. Below are a few considerations that apply to the enrollment of minors in Title II programs. North Carolina Community Colleges have a role in state laws pertaining to the driving eligibility of minors who have dropped out of high school as outlined in G.S. 115D-5, G.S. 20-11 and G.S. 20-13.2 and the corresponding guidance in State Board of Community Colleges Code 1D 200.95 and 1D 200.99.

Waiting Period for Minors
The State and Federal requirements do NOT specify that minor students should have a waiting period before their enrollment. That is a local provider decision, often developed in collaboration with the local school system. Some school systems prefer a waiting period as a deterrent to dropping out of school; others do not.

Signed Withdrawal Form and Notarized Petition for Enrollment

The enrollment of minors in NC Community Colleges is governed by the State Board Code 1D 200.95 and 1D 200.99. Minors withdrawn within a six-month period must obtain a signed official withdrawal form from the local public or private educational agency and a notarized petition of the minor's parent, legal guardian, or other person or agency having legal custody and control. The petition shall certify the minor's residence, date of birth, date of leaving school, name of last school attended, and the petitioner's legal relationship to the minor. Minors withdrawn for at least six months do not need a withdrawal form but still require a notarized petition of the minor's parent or legal guardian. Emancipated minors do not need a release form or notarized petition.

Emancipated Minors
An emancipated minor is a person below 18 years of age who has married or has a court order stating that the person is emancipated. Programs must obtain proof of emancipation before granting minors the status of emancipation. No agency or individual may grant a transfer in the "judicial decree of emancipation;" therefore, each agency must obtain proof of emancipation in the form of a court order or marriage license. Emancipated minors do not need release forms.

Serving Minors in ELA

Colleges may serve persons who are sixteen and seventeen years old in English Language Acquisition (ELA) classes if they meet the same criteria as native speaker minor students.

Disciplinary Guidelines for Minors

Programs should require minors to meet the same conduct standards and disciplinary policies and procedures as the adult students. Programs should not adopt different disciplinary procedures or grievance procedures for minor students, nor should they establish classes that are restricted to 16 – 17-year-old students only.

Enrollment of Court-ordered Youth

A judge may order an individual to attend a Title II class or take a high school equivalency test as a condition of release or parole. The court-ordered student may have specific attendance guidelines dictated by the court. If the court has not set attendance guidelines, the Title II program should determine the appropriate attendance requirement, similar to those developed for other mandated students.

It is recommended that the student sign a commitment contract or similar document that specifies the attendance requirements, and this document should be sent to the court official (i.e., probation officer or other designee providing oversight). Once the student contract is completed, or if the student is terminated, the appropriate court official should be notified in writing.

FOREIGN-BORN STUDENTS

Title II programs may <u>not</u> serve foreign students studying in the United States on F-1(Student) or J-1 (Study-Exchange) Visas. Federal adult education legislation does not specify the need to prove legal status of foreigners as a condition for enrollment in Title II classes. Thus, it is <u>not</u> necessary for foreigners to present passports, visas, work permits, or Social Security cards to prove legal status to enroll. However, foreign students (with F-1 Visas) enrolled in universities or private English language institutes may <u>not</u> simultaneously enroll in publicly funded adult education programs.

English language learners who have completed post-secondary education in another country but lack English language skills may enroll in Title II programs (if they do not have an F-1 or J-1 Visa). People in this country as "nannies" or "au pairs" on a study exchange (J-1) visa may not participate in Title II programs.

INCARCERATED STUDENTS

Any WIOA Title II Provider in North Carolina may serve students who are incarcerated, whether in a state prison or a local jail, regardless of whether the Provider is a community college. In all cases, coordination with the facility personnel is essential for student enrollment and program success. Priority for enrollment must be given to individuals who are likely to leave the correctional institution within five years of participation in the program.

North Carolina Department of Adult Corrections (NC DAC) formally partners with the NC Community Colleges to provide adult basic education, adult secondary education, and English language acquisition classes to students within their prisons; colleges and facilities create an annual Prison Education Plan. Adult education and literacy activities provided by community colleges are offered in accordance with this plan and State Board Code of Community Colleges sections pertaining to captive and co-opted groups (1D 700.98).

NC Community Colleges Numbered Memo cc21-53 issued November 30, 2021 announced that the State Board of Community Colleges granted blanket approval of all current and future College & Career Readiness courses in the combined course library to be offered for captive and co-opted groups, so long as instructional services are offered under the current operating procedures, policies, State Board of

Community Colleges Code, NC General Statutes, and contingent upon availability of funds.

NC Community College Title II Providers offering courses in correctional environments should be careful to create the class in ADVANSYS appropriately. Prison classes must be marked with a "P" and jail classes must be marked with a "J" in ADVANSYS and/or Colleague. Providers select this designation in ADVANSYS during the "new class" creation process. ADVANSYS only allows for the selection of one "type" when creating a new class. If the class is a membership class, providers should select the membership type for the new class creation and then add the "P" or "J" to the section in Colleague once integration has occurred. In Colleague, on SECT, add the "P" or "J" designation if unable to make the "type" selection in ADVANSYS.

STUDENTS WITH DISABILITIES

Providers should seek to ensure students with disabilities have equitable access to and participation in their academic programs and career pathways. Specific efforts should be made to advertise services and programs to individuals with disabilities, as well as to provide reasonable accommodation as needed. Arrangements for testing accommodation often need to be made prior to the student taking their NRS assessment for initial placement.

Students with disabilities in adult education programs may choose to request accommodations for instruction and/or assessment under the American Disabilities Act (ADA)and Section 504 of the Rehabilitation Act of 1973. In such cases, they should supply supporting documentation that explains the nature of their disability and their need for the requested accommodation. Appropriate documentation will vary depending on the nature of the disability and the specific accommodation requested. IEP and 504 plans students may have had during their k-12 educational experience do not transfer to the adult education environment, however in some cases they may be used as supporting documentation for requests for accommodation under the ADA.

Providers should refer to the North Carolina CCR Assessment Manual's section titled "Accommodating for Students with Disabilities or Other Special Needs Tests and Placement for Special Populations" and the test manufacturer's guidelines prior to providing accommodations for NRS assessments. Visit www.nctitle2.org/nrs-assessment for the current version of the NC CCR Assessment Manual.

North Carolina has committed state funds for community colleges to develop training programs for individuals with intellectual and developmental disabilities that lead to credential attainment and employment. Title II Providers should be aware of this "Access to Achievement" initiative and seek to collaborate for student recruitment, supports, and program design, particularly if they are in the service area of one of the funded community colleges. See NC General Statute 115D-10.21 and www.iddresourcenc.org for more information.

STUDENTS IN SPECIAL PROGRAMS

Alternate Placement

Students enrolling in in programs or classes designed to yield Measurable Skills Gains other than 1a (advancing to one or more higher Educational Functioning Levels by pre/post-test gain on a state-approved standardized assessment) may be exempt from NRS pre/post-testing if the Title II Provider has submitted an Alternate Placement Approval Form to NCCCS and received approval.

Examples of such programs may include, but are not limited to, integrated education and training (IET), workplace literacy, high school equivalency preparation, and postsecondary bridge programs. For these types of programs, with state approval, Providers may develop and implement alternate placement options which are aligned to the anticipated outcomes of the program. See the NCCC College & Career Readiness Assessment Manual available at www.nctitle2.org for more information about alternate placement.

Workplace Literacy

Workplace literacy programs are offered by a Title II provider in collaboration with an employer or employee organization. Activities must take place at a workplace or other offsite location designed to improve the productivity of the workforce. Milestones should be designed collaboratively between the employer and the Title II program and once met and documented through progress reports from the employer, may be eligible for MSG type 4.

Students in a Workplace Literacy program may need the approval of their employer to enroll, particularly if participation in the class will impact their work schedule and/or their pay. Though not required, it is best practice for employers to compensate employees for their class time. Workplace Literacy programs are often designed for Measurable Skills Gains outcome #4 Workplace Milestones.

Integrated Education and Training (IET)

Students in an IET program may need to meet additional enrollment requirements for the occupational training component of the program. For example, some healthcare classes require students obtain certain vaccinations or medical tests prior to enrollment. Title II Providers should discuss these requirements during the recruitment and enrollment process, so students are aware of the program purpose and requirements prior to committing. IET programs are often designed for Measurable Skills Gains outcomes #1c EFL Gain by Enrollment in Postsecondary Education or Training, #3 Transcript or Progress Report of Secondary or Postsecondary Credits, or #5 Passing Exam or Demonstrating Progress. In addition to an NRS registration, students must also be coded in ADVANSYS as an IET student using the secondary registration type.

Integrated English Language and Civics Education (IELCE)

An English language learner is defined under Section 203(7) of the Act as, "an eligible individual who has limited ability in reading, writing, speaking, or comprehending the English language, and

> (A) whose native language is a language other than English; or

> (B) who lives in a family or community environment where a language other than English is the dominant language."

National Reporting System (NRS) levels are not determiners for student eligibility. Non-native English speakers, who are receiving ELA and civics instruction as an integrated component of IELCE are still eligible to participate under IELCE even though they may have tested out of all six ELL levels in NRS. Programs should use alternate placement (with state approval) or the NRS assessment that best fits the level of the learner, e.g., TABE, CASAS. In addition to an NRS registration, students must also be coded in ADVANSYS as an IELCE student using the secondary registration type.

Developmental Education / Transition to Success (Community Colleges)

Students in Developmental Education courses offered through NC Community College Title II Providers may, or may not, have already applied to the college and begun college coursework. Providers should ensure the student has received appropriate academic advising regarding which courses are required for their course of study and how the Developmental Education / Transition to Success courses taken with the Title II Provider will impact their placement into gateway college English and math classes. These programs are usually designed for Measurable Skills Gains #1a - EFL gain by advancing one or more levels by pre/post-test. However, if the Provider has designed this program only for Measurable Skills Gain #1c – Enrollment in Postsecondary Education or Training, students may have an alternate placement if the state has approved the Providers' Alternate Placement Form. For more information regarding Developmental Education / Transition to Success at NC Community College Title II Providers, please visit the Transition to Success page at www.nctitle2.org. In addition to an NRS registration, students must also be coded in ADVANSYS as a "co-enrolled in college" student using the secondary registration type.

Adult High School (Community Colleges)

Adult High School programs are offered cooperatively between a NC Community College and a local educational agency (LEA). Each Adult High School has an Agreement of Affiliation between the two agencies. Student enrollment and eligibility are subject to the terms of this agreement. For more information about Adult Secondary Education page at www.nctitle2.org. In addition to an NRS registration, students must also be coded in ADVANSYS as an AHS student using the secondary registration type.

Participants versus Reportable Individuals

> **Federal Reporting of Enrollment**
>
> **WIOA defines enrolled students in two ways: participant or reportable individual. Both should be included in your data. Participant: an individual who completes at least 12 contact hours prior to separating for a period of 90 days without service or up to 180 days if they have a future service date. Only participants are reported for WIOA performance indicator purposes. Participant status must be achieved any time an individual enters, or reenters, an adult education program. Participants who continue receiving services across program years do not need to requalify as a participant in a new program year since exit has not occurred.**

When students enroll in the program, their attendance record is evaluated to determine their classification as a "Reportable" individual or a "Participant." If students enter the program on multiple occasions, their attendance record is re-evaluated each time they re-enter the program after a period of separation.

What students are classified as participants?
These are individuals who enroll in the program and have at least 12 contact hours and a valid NRS placement prior to separating for a period of 90 days without service or up to 180 days if they have a future service date. The student's attendance is tracked from their point of entry until their exit date in making this determination. Participant status is retained until an exit occurs.

What students are classified as reportable?
These are individuals for whom identifying information is collected and who may possibly enroll in the program. If the students who enroll separate from the program with fewer than 12 contact hours, these individuals are classified as "Reportable." If the students do not enroll but identifying information is collected on them which may include demographic data or administering an assessment, these individuals are also "Reportable." Providers are responsible for tracking these individuals.

Does a student have to have 12 or more contact hours within a program year to be considered a participant?
No, a student's attendance record is evaluated from the point of entry to the point of exit. There may be circumstances in which a student continues into a new program year from a prior program year and has twelve or more hours during that period but less than twelve hours in the current program year. For example, a student may begin on May 1, 2022, and have twelve or more contact hours by June 30, 2022. If this student continues into the program year without separating, the student automatically begins the new program year as a participant. It's also possible for a student to end a program year as a reportable individual, continue into the new program year and become a participant upon their twelfth contact hour during their continuous service period without separation.

Recruitment, Intake, & Orientation

To meet the regional needs identified in the WIOA local plan, Providers are expected to use a variety of community outreach and recruitment strategies so that English language learners and the populations identified in the plan as being most in need of adult education and literacy activities are aware of services.

Programs must have a process in place for conducting student intake. While the process may look different depending on the student population and the program, it should include methods for gathering and reporting student registration and placement information. The Literacy Education Information System (LEIS) form captures demographic, contact, education, employment, and related information. Information on this form must be entered into the student information system ADVANSYS within a week of receipt from the student. The program should determine the most appropriate method for gathering the needed information based on the student's skills and comfort level.

Student orientation is a program practice that helps students understand the Title II Program's purpose, structure, requirements, and resources for support while determining if it is a match for their goals. Programs should consider offering flexible schedules and formats for orientation based on the varied needs of their incoming students. During orientation or subsequent advising is an opportune time to introduce incoming students to other WIOA Core Partners or community organizations that can support them through their educational and career pathways.

Academic and Career Advising, Support Services

Advising

Advising is a critical practice for ensuring students set academic and career goals and build momentum for transitioning to the workforce or further education or training. Effective advising can also help ensure that students are participating in adult education and literacy activities that are contextualized to their goals and are engaging with sufficient intensity and duration so they make substantial progress. Providers may arrange for students to receive advising services from their staff, or from a partnering department or agency that is equipped. Students benefit from co-enrollment in other WIOA programs like NextGen Youth (WIOA Title I) and NC Works Career Centers (One-Stop Centers, WIOA Title III) for support along their educational and career pathways.

Support Services

Many students enroll in Title II AEFLA programs with a variety of needs and challenging situations in their lives that can become barriers to their attendance and success. Programs can work with Title II partners, community resources, and other organizations that provide wrap-around support to individuals with barriers to employment.

Title II AEFLA funds may be used to cover child and dependent care and transportation costs for students under certain circumstances. Documentation regarding use of funds (e.g., signed log or passes with the cost of the pass) is required. Cash payments to students whether in advance or as a reimbursement are not allowed.

IMPORTANT: Review OCTAE Program Memo 24-3 for further guidance on the topic of using Title II AEFLA funds for support services as well as information about other federal programs that provide assistance.

Note: Costs associated with intake, pre-testing, advising, and referrals to support services can often fall into the Career Services category (Section F) on the WIOA Title II Budget Forms submitted annually to NC Community Colleges.

Documenting and Reporting Student Attendance Hours

Collection of Student Hours: Title II providers must have a system in place for recording, validating, and reporting student attendance hours. This should include sign-in sheets or electronic attendance systems that verify the time the student entered and exited the instructional activity daily. Hours are then entered into the student information database, ADVANSYS, where they are then reviewed and subsequently approved for

reporting.

If a student exits a class for more than ten minutes during an instructional activity and then returns to the same instructional activity that day, the student must sign in and out each time.

After calculating the daily hours for each student, always round to the nearest 15-minute increment before entering the time in ADVANSYS. For example, Student A arrived at 9:20 AM and left at 11:00 AM. Student A was in class for 1 hour and 40 minutes, which would round to 1.75 hours (1 hr. 45 min). Student B arrived at 9:00 AM and left at 10:20 AM. Student B was in class for 1 hour and 20 minutes, which would round to 1.25 hours (1 hr. 15 min). Remember that 15 minutes is equal to 0.25 hour. Here is a little cheat sheet.

> **Contact hours for distance learning students are calculated differently. Refer to the CCR Distance Learning Manual for guidance.**

- 15 minutes = .25 hours
- 30 minutes = .5 hours
- 45 minutes = .75 hours
- 60 minutes = 1 hour

All Title II Providers must collect and report student attendance hours, as they help determine a student's participant status and eligibility for post-testing. NC Community Colleges also need to record student's attendance hours for determining the full-time equivalency (FTE) they report for their State Aid Basic Skills Allocation. The State Board Code of Community Colleges provides guidance for the collection and reporting of attendance hours for FTE in Chapter G, particularly 1G 200.1, 1G 200.94 and 1G 200.95. The NC Community College Compliance Services Team provides regular training for colleges and also conducts periodic on-site compliance reviews to ensure FTE is recorded and reported accurately and in accordance with the guidance.

Each hour of instruction shall be scheduled for sixty minutes. The Provider shall provide for a minimum of fifty minutes of instruction for each scheduled sixty-minute hour. A student must attend a minimum of fifty minutes of a scheduled sixty minutes of instruction to be counted in attendance for one hour.

Student Breaks: Breaks of ten minutes may be utilized each hour or during the period of instruction but cannot be accumulated. For example, a class scheduled from 6:00 p.m. until 9:00 p.m. cannot save all breaks until the end of the class period, adjourn one-half hour early, and report three hours per student in attendance. Student breaks cannot be accumulated, and class adjourned early. Breaks also should not be accumulated and class start time moved to a later time, but it is allowable to accumulate breaks and take them during the middle of a class. The following guidelines should help clarify the issue:
- Breaks cannot be accumulated to adjourn a class early.
- Breaks can be saved and taken in the middle of class (for any reason – lunch, dinner, etc.) if it is in the best interest of the students.
- Breaks cannot exceed the allowable ten minutes per hour of scheduled instruction.
- Students may not leave ten minutes early if the break for the last hour of class has not been taken.

CAREER PATHWAYS AND INSTRUCTIONAL PROGRAMMING

Major Points
1. WIOA requires local workforce development boards to convene their education partners to develop and implement career pathways. In North Carolina, the NCWorks Commission initiated Certified Career Pathways to connect employers, education and training programs, and support services and enable individuals to secure a job or advance in an in-demand industry or occupation. Integrated education and training is a key element in a career pathway.
2. Title II instructional programs fall into three primary areas: Adult Basic Education (ABE), Adult Secondary Education (ASE), and English Language Acquisition (ELA).
3. Adult Basic Education (ABE) is a program of instruction designed for adults functioning below a 9th grade level who need to improve their reading, writing, speaking, problem solving, or computation skills. Based on placement results from approved standardized tests, students fall into one of four ABE levels.
4. Adult Secondary Education (ASE) is a program of instruction designed for adults functioning between a 9.0 – 12.9 grade level who need to further their education to transition to postsecondary education or employment. Adult Secondary Education includes the Adult High School Diploma program and the High School Equivalency program.
5. English Language Acquisition (ELA) is a program of instruction designed to help limited English proficient adults achieve competence in speaking, reading, listening, and writing the English language as well as other related basic skills.
6. Title II's instructional areas reflect the allowable activities of adult education, literacy, workplace education, family literacy, English language acquisition, integrated English literacy and civics education, workforce preparation, and integrated education and training.

Career Pathways

Career pathways are an integrated service delivery model across education and workforce development that allow local areas to design solutions leveraging the strengths of workforce development and education across the spectrum. WIOA requires local workforce development boards to convene their education partners to develop and implement career pathways. Section 3(7) of WIOA includes the first-ever federal definition of the set of core activities that are required in career pathways. They include a combination of rigorous and high-quality education, training, and other services that:

A. Aligns with the skill needs of industries in the economy of the State or regional economy involved.

B. Prepares an individual to be successful in any of a full range of secondary or postsecondary education options, including apprenticeship.

C. Includes counseling to support an individual in achieving the individual's education and career goals.

D. Includes, as appropriate, education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster.

E. Organizes education, training, and other services to meet the particular needs of an individual in a manner that accelerates the educational and career advancement of the individual to the extent practicable.

F. Enables an individual to attain a secondary school diploma or its recognized equivalent, and at least 1 recognized postsecondary credential; and

G. Helps an individual enter or advance within a specific occupation or occupational cluster. [WIOA, Sec. 3(7)]

> **Title II providers are important partners in the development of Certified Career Pathways to ensure that sufficient entry and exit points are developed for low-skilled job seekers.**

Under Title II, Integrated Education and Training (IET) is the instructional strategy for career pathways, and elements "D" and "E" from the WIOA definition of a career pathway align with the IET elements of concurrent activity and contextualization as acceleration strategies.

Certified Career Pathways: In North Carolina, workforce development boards are working regionally to create Certified Career Pathways that focus on matching worker preparation to employer need in high-demand occupations. They are created by regional and local teams that consist of engaged employers, workforce development boards, high schools and community colleges, universities, local community leaders and chambers of commerce.

Certification indicates that career pathways meet eight best-practice criteria including demand driven, employer led, collaborative, career aware, coordinated, work based, flexible and evaluable. Teams apply to the NCWorks Commission for certification. The application requires a narrative detailing the development of the pathway and evidence of meeting each of the eight criteria. Teams must identify all of their members and each member's role in the development of the pathway. Certification review is completed by a statewide interagency team of workforce professionals that makes recommendation to the NCWorks Commission. For more information, visit NCWorks Certified Career Pathways | NC Commerce.

Primary Program Areas

Title II is designed to prepare students for success in their next steps in college and further training, at work, and in the community. To achieve this purpose, instruction falls into three primary areas that the National Reporting System defines into various functioning levels.

Adult Basic Education (ABE) is a program of instruction designed for adults functioning below a 9th grade level who need to improve their reading, writing, speaking, problem solving, or computation skills. Based on placement results from an approved standardized test, students fall into one of four ABE levels.

Adult Secondary Education (ASE) is a program of instruction designed for adults functioning between a 9.0 – 12.9 grade level who need to further their education to transition to postsecondary education or employment. Adult Secondary Education includes the Adult High School Diploma program and the High School Equivalency program.

English Language Acquisition (ELA) is a program of instruction designed to help limited English proficient adults achieve competence in speaking, reading, listening, and writing the English language as well as other related basic skills.

Instructional Offerings

Title II's instructional offerings include adult education, literacy, workplace education, family literacy, English language acquisition, integrated English literacy and civics education, workforce preparation, and integrated education and training. These allowable activities were described on page 15. Within these activities, Title II providers have developed a variety of specialized delivery models to serve special populations and/or needs.

In North Carolina there are several ways for students to earn a high school diploma or equivalent as an adult education student in a Title II Program.

Adult High School (AHS) is an Adult Secondary Education program offered cooperatively with a local education agency (LEA) and community college so that adults may earn an Adult High School diploma. The Adult High School diploma must be issued in conjunction with a LEA, as community colleges do not have the statutory authority to issue high school diplomas without this partnership. Contact the NCCCS for more information about the AHS Diploma Program. Download the current Adult High School Implementation Guide.

- **Agreement of Affiliation**

  Colleges must sign an Agreement of Affiliation with their LEA to offer an Adult High School Diploma program. Copies of the Agreement of Affiliation may be obtained from the System Office. Once an agreement is signed by both community college and local school officials, a copy must be sent to the North Carolina Community College System Office to the attention of College and Career Readiness - - Adult High School/High School Equivalency. The Agreement of Affiliation is to be updated every three years or when there is a change in either community college or LEA administration.

- **Adult High School Transcripts**

  Adult High School transcripts are maintained, indefinitely, at each community college, not at the System Office, nor at the LEA.

High School Equivalency Exams

The two nationally recognized assessments used to obtain a state-issued High School Equivalency credential in North Carolina are GED® and HiSET®. Both High School Equivalency assessments are recognized by the US Department of Education and assess the same content areas. The North Carolina Community College System is the administrator of all High School Equivalency testing. Passing the complete battery of either assessment will result in the same High School Equivalency Diploma, which is issued by the North Carolina State Board of Community Colleges. A High School Equivalency Diploma may also be earned within the TotalTranscript pathway by combining eligible passing scores from the GED®, HiSET®, and/or TASC® exams. Upon completion of a High School Equivalency credential, graduates must obtain their diplomas and transcripts from DiplomaSender, North Carolina's official High School Equivalency document service.

The salaries of high school equivalency examiners and associated testing costs may not be covered by Title II funds (State and Federal). Non-Title II funds must be used to cover GED® and HiSET® expenditures, including High School Equivalency graduation celebration activities.

HiSET® is the only High School Equivalency assessment administered at correctional facilities affiliated with the North Carolina Department of Adult Corrections.

Multiple Pathways to High School Equivalency (MPHSE) Diploma Program

The MPHSE Diploma Program is an alternative method for earning a High School Equivalency Diploma in NC. The State Board approved the MPHSE Diploma Program on December 4, 2015. The MPHSE establishes a formalized system to provide students with a clear, yet flexible, conduit toward earning a high school

equivalency credential. The student is required to demonstrate high school-level competencies in selected content areas.

The updated Multiple Pathways to High School Equivalency (MPHSE) Diploma Program Operating Guidelines is available via the College and Career Readiness webpage. For more information, refer to the [MPHSE Operating Guidelines](#).

Basic Skills Plus

Basic Skills Plus (BSKP) is a tuition waiver program enacted by the North Carolina General Assembly in 2010 under G.S. 115D-5(b)(15) with guidance from the State Board Code of Community Colleges (1E 800 Waivers, and 1D 200.98 Basic Skills Plus). It allows for the waiver of in-state tuition for eligible Continuing Education or Curriculum courses for students who are concurrently enrolled as participants in a Title II program at the same college, are seeking a high school diploma or equivalent, and have an Adult Secondary Education level in English or math or are in the Adult High School program.

BSKP Waivers should not exceed 12 credit hours for Curriculum (CU) courses or a single qualifying Continuing Education (CE) course. A qualifying CE course is one that aligns with an industry or state recognized credential (NCCCS Numbered Memo CC24-021). Curriculum courses should be within an occupational or technical credential program of study for an approved curriculum certificate as listed in the college's catalogue (NCCCS Numbered Memo CC21-041). BSKP waivers only apply to CU tuition and CE registration fees. They do not extend to local student fees. The waiver of local fees is governed by local policy.

Participants must be registered concurrently in Title II and eligible training courses in the same semester or term and at the same institution (Basic Skills Plus Policies and Procedures Implementation Guide, revised June 25, 2021).

Participants with a high school diploma or its recognized equivalent are not eligible for Basic Skills Plus. Students who earn their Adult High School or High School Equivalency diploma while receiving the BSKP Waiver may complete the specific waived course section(s). However, students are not eligible to register for additional courses using the BSKP Waiver; they should continue their studies with the support of other financial aid resources for which they may now be eligible. (Basic Skills Plus Policies and Procedures Implementation Guide, revised June 25, 2021).

An undocumented student is not eligible for waiver of in-state tuition. See State Board Code, Admission to Colleges (1D SBCCC 400.2(b1) and 1D SBCCC 400.2(b4)).

Basic Skills Plus records are always reviewed by the Compliance and Accountability team during a compliance review. The reviewers will need to see proof of student eligibility, application of the waiver, and concurrent enrollment. They will need to see student attendance records for both the Basic Skills instruction and the CU or CE instruction. Therefore, it is recommended Title II Providers coordinate with the CE and CU registrars and their business office when implementing Basic Skills Plus Waivers.

For more information and guidelines, refer to the [Basic Skills Plus Implementation Guide](#)

ASSESSMENT

Major Points
1. The *NC College & Career Readiness Assessment Manual* is based on guidance from the US Department of Education, Office of Career, Technical and Adult Education (OCTAE), which specifies requirements for statewide assessment policies that must contain certain elements and be submitted to and approved by OCTAE each year. The NC CCR Assessment Manual is located on the NCCCS website.
2. All staff who administer or score any standardized assessment used to measure educational gain must be trained before administering the tests by a certified trainer. A refresher course should be completed every two years.
3. All students entering Title II classes must be assessed by a standardized test approved by the National Reporting System (NRS) or given an alternate placement (with state approval). The pre-test for the program year or the first period of participation must be administered within the first twelve hours of class instruction. This requirement may be different for students enrolled in the Adult High School Diploma program. Please reference the NC CCR Assessment Manual.
4. The NC CCR assessment policy states that a minimum of 65% of all participants should be post-tested annually.
5. Local programs are responsible for providing fully accessible services and for ensuring that these services meet reasonable criteria, including pre- and post-testing for adults with disabilities.

Need for Assessment Policy

North Carolina's assessment policy provides a framework to measure program effectiveness and provides important criteria for continuous improvement on several levels.

- At the student level, an individual assessment provides vital, reliable information about the student's academic status and progress and allows the student to make informed decisions about goal setting.
- At the program level, accurate assessment data are critical for decision making in planning, instruction, professional development, and program improvement. Student assessments help instructors pinpoint student needs and choose appropriate curricula. Aggregate data inform program directors regarding needed improvements and help guide professional development.
- At the State and Federal level, implementation of North Carolina's assessment policy ensures that high quality accurate data are collected statewide and reported to the Federal government so programs can be compared across the state and nation.

Understanding the North Carolina College and Career Readiness Assessment Policy is critical for administrative, instructional, support, and data staff members. The State policy is based on guidance from

the US Department of Education, Office of Career, Technical and Adult Education (OCTAE), which specifies requirements for statewide assessment policies that must contain certain elements and be submitted to and approved by OCTAE each year. These regulations also describe how tests must be administered locally to accurately measure educational gains.

Visit the NC Title II website to download a copy of the
NC College and Career Readiness Assessment Manual.

INSTRUCTIONAL DELIVERY

Major Points
1. Instruction in Title II programs must be of sufficient intensity and quality and based on the most rigorous research available, so that participants achieve substantial learning gains.
2. At a minimum, quality instruction should be grounded in research, standards-based, provided by qualified staff, contextualized, and technology-rich.
3. All Title II providers are expected to provide standards-based instruction using the North Carolina Community College System College and Career Readiness Adult Education Standards and or The English Language Proficiency Standards (ELPS).
4. Four common instructional delivery models include (1) Managed Enrollment, (2) Open Entry/Open Exit, (3) Tutoring, and (4) Distance Learning. Agencies should ensure that they use the model(s) that best meet the needs of the targeted student population.
5. As part of its workforce preparation activities, Title II providers may now offer and integrate computer literacy classes into a student's program of study. However, stand-alone computer literacy classes should not be offered to students who are not co-enrolled in other adult education and literacy classes.

Standards-Based Instruction

Instruction in Title II programs must be of sufficient intensity and quality and based on the most rigorous research available so that participants achieve substantial learning gains. At a minimum, quality instruction should:

1. Be grounded in best practice documented by viable research,
2. Be aligned to the North Carolina College and Career Readiness Adult Education Content Standards,
3. Be taught by qualified staff,
4. Be contextualized, and
5. Incorporate technology.

All Title II providers are expected to provide standards-based instruction using the North Carolina Adult Education Content Standards. These standards were originally developed, refined, and field tested by adult educators across the State during 2007 to 2010. With the introduction of the College and Career Readiness Standards for Adult Education by the Office of Career, Technical, and Adult Education (OCTAE) in April 2013, the NCCCS College and Career Readiness Adult Education Standards were aligned to reflect these new standards.

Lesson plans and learning units aligned to the College and Career Readiness standards should be used and available for review during State monitoring visits.

> **Additionally, the English Language Proficiency Standards are companion standards that assist English Language Acquisition programs to align with the College and Career Readiness Standards.**

Contextualized Instruction

Title II programs should provide learning in context, including through integrated education and training, so that an individual acquires the skills needed to transition to and complete postsecondary education and training programs, obtain and advance in employment, and exercise the rights and responsibilities of citizenship. Contextualized instruction is aimed directly at developing the skills and knowledge that adults need to deal with specific situations or perform specific tasks, and that they have identified as important and meaningful to themselves "right now" in their everyday lives. In addition, rather than focusing only on the possession of basic skills and knowledge, contextualized instruction focuses on the active application of those skills and that knowledge "in a context". This context should be based on "real-world" experiences. Contextualized instruction lends itself well to project-based learning and other student-centered practices.

> **A great resource for evidence-based materials for curriculum and instruction is LINCS (Literacy Information and Communication System).**

Instructional Delivery Models

There are various instructional settings that are appropriate for adult learners. The key is to provide a learning environment that is invitational and effective. Four common instructional delivery models include: (1) Managed Enrollment, (2) Open Entry/Open Exit, (3) Tutoring, and (4) Distance Learning. Providers should ensure that they use instructional model(s) that best meet the needs of their targeted student population.

- **Managed enrollment classes** have an established cycle with a start and end date. Students are only allowed to enter the class at the beginning of the cycle and are expected to remain until the end. This model is especially beneficial in preparing students for the structure and requirements of postsecondary education/training.
- **Open entry/open exit instruction** provides the flexibility that some adult learners need because of family and/or work responsibilities. Students can enroll and exit at any time during the scheduled course.
- **Tutoring** provides one-on-one or small group instruction through the use of tutors, usually unpaid volunteers.
- **Distance learning** - "non-classroom or hybrid based" instructional model in which students have access to online instruction at a distance using state-approved software, video, or paper-based distance learning programs. Distance learners must be assessed under the same guidelines as all adult learners in the State. Students in distance learning should attend an orientation and must be pre- and post-tested. Since the exact time distance learning students spend on various activities cannot be directly verified, the "proxy hours" are calculated using one of three NRS-approved methods: clock time, teacher verification, or learner mastery.

> **Please refer to the CCR Distance Learning Manual for further guidance.**

Title II programs should effectively use technology, services, and delivery systems, including distance education, in a manner sufficient to increase the amount and quality of learning. All students should have access to computers and/or other digital devices. As part of its workforce preparation activities, Title II providers should offer and integrate digital literacy classes into a student's program of study. The Museum and Library Services Act of 2018, defines digital literacy as "means the skills associated with— "(A) using technology to enable users to find, evaluate, organize, create, and communicate information; and "(B) developing digital citizenship and the responsible use of technology."

Course Scheduling

All instruction should be scheduled with sufficient intensity and duration to allow for educational gains. Course scheduling should also provide sufficient flexibility to accommodate the varying needs of adult learners with work, family, and related responsibilities.

PERFORMANCE & ACCOUNTABILITY

Major Points

1. The National Reporting System (NRS) establishes assessment guidelines, common definitions, and standard data collection protocol in addition to criteria for measuring Federal performance measures.
2. Under WIOA, there are six primary indicators of performance for all the Titles related to employment rates for 2nd and 4th quarters after exit, median earnings, credential attainment, measurable skill gains, and effectiveness in serving employer needs.
3. Measurable skill gains (MSGs) can be achieved in five ways: (1) comparing a participant's pretest with the participant's posttest, using NRS-approved assessments; (2) awarding adult high school credits in an Adult High School Diploma program (enough to move from ABE Level 5 to ABE Level 6 according to the State's guidelines); (3) enrollment in postsecondary education and training after exit; (4) receipt of a High School Equivalency credential; and (5) receipt of an Adult High School diploma. Only the most recent MSG achieved is reported per period of participation (POP), even if more than one MSG is achieved within a POP.
4. A POP begins when a student enters the program and does not end until the student separates from the program. If a student has 12 or more contact hours and a valid NRS placement during this time, the student is classified as a participant within the period of participation.
5. Reportables are defined as individuals who have taken action that demonstrates an intent to use program services and who meet specific reporting criteria of the program. A Reportable has accumulated less than 12 hours of attendance but has taken at least one of the following actions related to a local Title II program: (1) Individuals who provide identifying information, or (2) Individuals who only receive information, information services, assessment, or activities.
6. Every POP is treated as a separate event for a participant and performance indicators apply separately to each period. This means that for each POP, the State must report measurable skill gains and conduct follow-up on the participant after exit from each period to collect data on the appropriate post-exit indicators.
7. The credential attainment indicator measures two types of credentials: (1) receipt of a secondary school diploma or recognized equivalent during participation or within one year after exit from the program. The receipt of this credential is only counted if the participant also enters postsecondary education or training, or employment within one year after exit. (2) receipt of a recognized postsecondary credential during participation or within one year after exit from the program.
8. Based on NRS guidelines, every State must have an electronic management information system to collect student data. North Carolina's data management system is ADVANSYS by Benchmark, ITS. Providers are required to submit data electronically using ADVANSYS. All data, including demographics, attendance, and assessments, must be entered at least once per week and approved within a week of entry. Data must be collected for all eligible students receiving services provided by Title II AEFLA funds. This includes individuals in either the Reportable or Participant classification.

9. **A uniform data collection form has been developed to collect the information for input into ADVANSYS, the management information system. This instrument is referred to as the Literacy Education Information System (LEIS) form.**
10. **The NCCCS conducts two types of program monitoring annually: (1) on-site monitoring of selected Title II providers each year based on risk assessment results and (2) desktop monitoring reports for all Title II providers.**

National Reporting System (NRS)

The National Reporting System https://nrsweb.org for Adult Education (NRS) is the accountability system for the Federally funded adult education program, authorized by Section 212 of the Workforce Innovation and Opportunity Act (WIOA). The NRS includes the WIOA primary indicators of performance, measures that describe adult education students and their program participation, methodologies for collecting performance data, and program reporting procedures. The NRS support project offers training and technical assistance activities to assist states in collecting, reporting, and using data.

The NRS support project is funded by the U.S. Department of Education's Division of Adult Education and Literacy (DAEL), Office of Career, technical and Adult Education (OCTAE) and is conducted by American Institutes for Research (AIR).

The National Reporting System for Adult Education (NRS) is an outcome-based reporting system for the State-administered, federally funded adult education program. Developed by the U.S. Department of Education's Division of Adult Education and Literacy (DAEL), the NRS continues a cooperative process through which State adult education directors and DAEL manage a reporting system that demonstrates learner outcomes for adult education. The project is being conducted by the American Institutes for Research (AIR) in Washington, DC.

WIOA Primary Indicators of Performance

Under section 116(b)(2)(A) of WIOA, there are six primary indicators of performance for all the WIOA titles:

1. **Employment Rate – 2nd Quarter After Exit:** The percentage of participants who are in unsubsidized employment during the second quarter after exit from the program;
2. **Employment Rate – 4th Quarter After Exit:** The percentage of participants who are in unsubsidized employment during the fourth quarter after exit from the program;
3. **Median Earnings – 2nd Quarter After Exit:** The median earnings of participants who are in unsubsidized employment during the second quarter after exit from the program;
4. **Credential Attainment:** The percentage of those participants enrolled in an education or training program (excluding those in on-the-job training (OJT) and customized training) who attain a recognized postsecondary credential or a secondary school diploma, or its recognized equivalent, during participation in or within one year after exit from the program.
A participant who has attained a secondary school diploma or its recognized equivalent is included in the percentage of participants who have attained a secondary school diploma or its recognized equivalent **only if the participant also is employed or is enrolled in an education or training program leading to a recognized postsecondary credential within one year after exit from the program;**
5. **Measurable Skill Gains:** Includes educational functioning level gain through pre- post testing, entry into postsecondary education after program exit, receipt of a high school/secondary credential, and awarding of Adult High School Credits for progression from ABE Level 5 to ABE Level 6.
6. **Effectiveness in Serving Employers:** WIOA sec. 116(b)(2)(A)(i)(VI) requires the US Department of Labor and Department of Education to establish a primary indicator of performance for effectiveness in serving employers.

Data Matching: North Carolina uses a data matching system to obtain verification of the employment, high school credential, and postsecondary education indicators.

The State has developed a system that allows individual agencies to share data through social security numbers without compromising confidentiality. For employment-related outcomes, the System Office uses North Carolina Department of Commerce wage income records. For postsecondary outcomes, data are matched with the National Student Clearinghouse, a centralized database of public colleges and universities and Continuing Education enrollment in an occupational training course and the North Carolina Community College System Data Warehouse.

WIOA Periods of Participation, Measurable Skill Gains, and Credential Attainment

WIOA's accountability requirements reflect increased emphasis on employment and postsecondary education, and more tracking of participants after their exit. Three areas require a closer examination to better understand the impact of the accountability requirements: periods of participation (POPs), measurable skill gains (MSGs), and credential attainment.

Periods of Participation (POP)

May a student have more than one POP?
Yes, each time a student separates and re-enters the program attending 12 or more contact hours before separating again, the student is a participant in a new period of participation.

When does a student separate/exit from the program?
A student is considered to have exited/separated from the program after a period of 90 days without service or up to 180 days if a prior planned exit and future service date were **identified by the student** and recorded by the staff.

What is a future service date?
A student who has a planned absence and expects to return may have a scheduled future service date. This date must be no more than 180 days from their last date of attendance or NRS assessment. This must be recorded on the LEIS form and in ADVANSYS. If the student returns by the future service date, then the student does NOT exit/separate from the program, and the student's record is evaluated for the same period of service or POP.

For purposes of determining if a student is receiving service, only the following count as service:
- Contact hours, recorded in ADVANSYS
- Valid NRS assessment scores, recorded in ADVANSYS

How are periods of participation used for calculating performance indicators?
State performance on all core outcome measures under WIOA, excluding median earnings, is calculated as a percentage of the total number of outcomes achieved by the total number of periods of participation.

Do the WIOA performance measures apply for each period of participation?
Each time a student qualifies as a participant within a program year, we add the student to the denominator. For example, if a student qualified as a participant on three occasions during a program year, we add that student to our denominator three times.

Every period of participation is treated as a separate event for a participant and performance indicators apply separately to each period. This means that for each period of participation, the State must report

measurable skill gains and conduct follow-up on the participant after exit from each period to collect data on the appropriate post-exit indicators. Each exit date from a period of participation is used to determine the follow-up time. For example, if a student exits in December, re-enrolls in April, and exits again in June, the State will report on appropriate post-exit indicators for both exits. The second-quarter employment outcome, for example, would be reported in the April through June quarter for the December exit, and in the following October through December quarter for the June exit.

How do periods of participation affect pre- and post-testing of participants?
All participants enrolled in federally and state funded adult education programs must have an initial placement; initial placements include a pre-test, an Entering EFL for Adult High School students, or an alternate placement. The initial placement is the basis for participant NRS level assignment and determination for entering an EFL. The initial placement for the first POP of each program year must be administered or assigned within a student's first 12 hours of class instruction. If multiple assessments are taken, all tests with valid scores, as defined by the test manufacturer's guidelines, can count as pre-tests for the POP. Each student receives one initial level placement per POP based on their lowest valid score from any approved NRS pre-test or from an alternate placement. If more than one NRS assessment is given, all assessments taken within three calendar days of the first assessment will be evaluated to determine the student's initial placement.

If a student returns to a local Title II program after 90 or more days of separation, the student will begin a new POP. In order to resume instruction, it is necessary for the student to establish an initial placement for their new POP; this may be accomplished by assigning an alternate placement if applicable; manually entering the EFL that reflects the most recent test from their previous POP; or, if more than six months have elapsed since the most recent test, taking a new pre-test. The initial placement for the second or third POP must be established before the student reaches 12 hours of attendance.

*__Note__: This guidance is only applicable to students who separate and reenter within the same program year. If a student separates, then reenters in a new program year, the student will need to take a pre-test or take an alternate assessment measure in order to establish an entering EFL for the new year.

Post-testing: The student is held accountable for a Measurable Skills Gain (MSG) for every POP. While there are five ways that students may earn an MSG depending on their program of study (discussed in the next section), post-testing is often the most common method for earning an MSG. Therefore, all students with sufficient hours (and progress) should be post-tested within every POP. Annually, providers are required to post-test a minimum of 65% of participants who are in levels or programs eligible for posttest gains. This does not apply to students enrolled in the AHS Program, students without a pre-test lower than ABE 6, nor students with alternate placement. For more information on alternative placement, please see the NC Assessment Manual.

Must student demographic data be collected for each period of participation?
Yes, every student in an adult education program funded by NCCCS must have a LEIS form completed at the start of each Period of Participation within the program year. The practice is a requirement by OCTAE since a student's information such as employment status or barriers may change with each new POP.

GUIDANCE FOR MAXIMIZING STUDENT PERFORMANCE FROM APRIL UNTIL JUNE

During a meeting in fall 2023, there was discussion about the potential negative impact of students enrolling in College & Career Readiness coursework later in the fiscal year. This is a myth. Between April 15 and June 30, there are approximately 76 days, or 11 weeks, to provide instruction and earn FTEs and MSGs before the end of the program year. Below is a quick guide on how CCR funding is calculated, followed by a list of best practices to help maximize student performance during the final quarter of the fiscal year.

Calculating CCR FTE and MSGs

Full-Time Equivalent (FTE) Student – An amount of instruction that equates to 512 student hours in membership as defined in 1G SBCCC 200.93 and 1G SBCCC 200.94. Failure to enroll students for a period of three months, or 1/4 of the school year, will result in fewer FTEs earned. Providers also receive state and federal allocations for the number of MSGs earned. However, providers are not penalized for students who do not earn an FTE.

Best Practices for April-June

- High School Equivalency Fast Track – intense, subject specific classes that run for 5 weeks. Students complete the HSE practice test for the subject at the beginning of the course and again at the end, with the goal of successfully passing the official exam at the end of the course.
- Adult High School Fast Track– students can have their entering EFL set by AHS transfer credits and work at their own pace to complete subjects still needed for graduation.
- Multiple Pathways to High School Equivalency – students can enroll and complete only the missing pieces needed for graduation.
- Measurable Skills Gains 3-5 (IET/Career Pathways) – Based on a provider's career pathway offerings, students may earn an MSG using MSGs 3-5 at the end of a program year. For providers who have not submitted a pathway for approval to use these MSGs, please use the state's repository to identify possible offerings.
- Partial Completers – Access DiplomaSender to identify partial HSE completers and recruit students to participate in Fast Track courses.
- Hybrid Courses – Combine face-to-face classes with assignments on an approved educational software platform to allow students to clock additional hours and be prepared for a posttest sooner.

OCTAE POLICY

Finally, it is important as a System that federal policy is followed: "Programs should not delay enrollment or services to participants until a new program year even if programs believe there is insufficient time for the participant to make any type of Measurable Skill Gain by the end of that program year." (OCTAE Program Memorandum 17-2, pg. 23) Eligible students may not be denied enrollment into Title II programs, regardless of the time of year in which they seek to enroll.

Measurable Skill Gains (MSG)

Adults enroll in adult education programs for many different reasons, but most often they attend to gain the skills they need to be successful in school, the workplace, and their everyday lives. Under WIOA, programs are able to determine their success in helping students gain those skills, using the measurable skill gains (MSG) indicator. This section explains what MSG is, how it is measured, who is included in the indicator, and how it is different from the outcome measures that State and local adult education programs previously collected.

What is a measurable skill gains indicator?

Measurable Skill Gains (MSGs) are performance indicators intended to show a participants' progress toward achieving employment in a livable-wage job, perhaps on a career pathway, or earning a credential, such as an HSE diploma or industry-recognized training certificate. There are five types of MSGs.

1. Educational Functioning Level (EFL) Gain
2. Secondary Diploma/Equivalent
3. Secondary or Postsecondary Transcript (Most Relevant to IET)
4. Progress toward Milestone (Most Relevant to Workplace Literacy)
5. Passing Technical/Occupational Knowledge-Based Exam (Most Relevant to IET)

It is important to note that a student may earn any of these MSGs, even multiple times, during a program year. However, only the most recent MSG earned in a program year for a Period of Participation (POP) will be counted on Table 4. Providers are encouraged to track all student progress for program analysis of strengths and areas to target for improvement.

MSG 1: Educational Functioning Level (EFL) Gain

- 1a - Advancing to one or more higher levels by pre-and post-test EFL gain.
  - o **Provider Documentation**: Original NRS assessment in student master file.
- 1b - Adult High School credit for applicable AHS participants.
  - o **Provider Documentation**: Permanent AHS master file (see NCCCS AHS Implementation Guide for file requirements).
- 1c - Participants who are enrolled in a program below the postsecondary level and who enroll in state-recognized postsecondary education (PSE) or training during the program year. That is, an EFL gain may be counted for participants who enroll in a postsecondary education or training program and who do not exit adult education. Please note that enrollment in a state-recognized postsecondary education or training program must occur after enrollment in adult education.
  - o **Provider Documentation**: None. Students are data matched against National Student Clearinghouse and NCCCS Registration reports each period.

Important Notes about MSG 1c – Postsecondary Enrollment

1. Students must enroll in an approved curriculum or continuing education (CE) course. The criteria to determine CE course eligibility are as follows: (1) the course must have 96+ hours, and (2) the course must EITHER (a) have a tier funding code of 1A, 1B, or 2, OR (b) have a tier funding code of 3 and have a credential associated with it in the CE Registration report. A list of approved CE courses is available on the CCR Program Performance & Accountability page.
2. The PSE MSG is data matched by the state's System Effectiveness team. Data drawn from the National Student Clearinghouse and the CE Registration reports are used for data matching. CE Registration reports are sent to the state by each college after each load period ends (summer, fall, spring). The state uses the enrollment data from the CE Registration reports to data match CCR students for the PSE MSG. The summer load period is from 5/16-8/14, so the state does not receive the summer CE Registration report until mid-September. This means that CCR students who enroll in CE between 5/16-8/14 cannot be captured due to the delay in receiving the summer CE Registration report.
3. A student's first enrollment in a state-recognized postsecondary education program must occur after enrollment in adult education. Specifically, for enrollment in an approved continuing education (CE) course, the start date of the CE course must be after the student's initial enrollment in adult education. Enrollments in degree-seeking programs count for the PSE MSG if they occur at least one term after the term corresponding to the student's initial enrollment in adult education. For example, if a student enrolls in adult education on September 1, that will correspond to the fall term. To obtain the PSE MSG, the student's enrollment in a degree-seeking program must be no earlier than the following spring term.
4. Providers *should not* enter a PSE outcome in ADVANSYS unless that outcome has been data matched and first appears in Power BI.
5. PSE MSG counts are available in Power BI on the Overview tab. (*Providers can right click on the PSE MSG cell and select "drill through" to export a list of students receiving the PSE MSG.*)

- 1d - Participants who pass a subtest on a state-recognized high school equivalency examination within the program year.
  - o **Provider Documentation**: None. Students are data matched monthly with Diploma Sender reports.

MSG 2: Secondary Diploma/Equivalent

- AHS Diploma
    - o **Provider Documentation**: Permanent AHS master file (see NCCCS AHS Implementation Guide file requirement).
- High School Equivalency (HSE) Diploma (includes MPHSE, GED, HiSET)
    - o **Provider Documentation:** None. Students are data matched monthly with Diploma Sender reports.

MSG 3: Transcript or Progress Report of Secondary or Postsecondary Credits

- Applicable to students enrolled in IET programs only.
- Students take for-credit courses, such as the training component of the IET, while enrolled in the adult education program.
    - o Full-time students must complete at least 12 credit hours per semester during the program year.
    - o Part-time students must complete at least 12 credit hours over the course of 2 consecutive semesters during the program year.
- **Provider Documentation**: A transcript showing satisfactory achievement in each class will be uploaded to the student's ADVANSYS record for NCCCS approval for the MSG to be earned.

MSG 4 - Workplace Milestones

- Applicable to students enrolled in IET or workplace literacy only. Requires working with employer or training partner.
    - o Most relevant for students in workplace literacy programs.
- Determine with employer/trainer what goals will be **prior to** starting the project.
    - o Examples include:
        - ♣ On-the-job training
        - ♣ Completion of 1 year of an apprenticeship program
        - ♣ Other milestones as determined by employer or training provider.
        - ♣ Pay increases due to acquired skills
    - o Employer/trainer provides written communication of satisfactory or better progress toward goal.
- **Provider Documentation**: The progress report from an employer or training provider will be uploaded to the student's ADVANSYS record for NCCCS approval for the MSG to be earned. Progress report must show completed milestones, increases in pay resulting from new skills, or increased performance.

MSG 5 - Passing Exam OR Demonstrating Progress

- Applicable to students enrolled in **workplace literacy or IET programs only**. Exams and progress milestones must be established and approved prior to starting the IET.
    - o Well-suited to IETs that lead to recognized postsecondary credentials and include stackable, occupational credentials that are required for jobs.
    - o *Workplace literacy is defined as* "adult education and literacy activities offered by an eligible provider in collaboration with an employer or employee organization at a workplace or an off-site location that is designed to improve the productivity of the workforce."
- MSG may be earned in two different ways.
    - o 1. Passing knowledge-based exam or certification of completion

- ♣ Passage of an exam may include passing a component exam in a registered apprenticeship program or an employer-required knowledge-based exam, satisfactory attainment of an element on an industry or occupational competency-based assessment, or other competition test necessary to obtain a credential.
- ♣ *Please note*: Passing a test in an academic course by participants enrolled in a traditional postsecondary education program is **not** considered a gain for this MSG type. For example, work readiness certificates that are not occupation specific are **not** allowable (Career Readiness Certificate, WorkKeys, etc.)
- o 2. Demonstrating progress in gaining technical skills
  - ♣ Based on trade-related benchmarks
- **Provider Documentation**: Appropriate documentation will be uploaded to the student's ADVANSYS record for NCCCS approval for the MSG to be earned. *Example documentation:* Copy of results of exam, test or assessment or copy of diploma or certificate.

Who is included in the measurable skill gains indicator?

MSG is reported for all participants (participants are students with 12+ contact hours and an initial placement) within the period of participation. However, participants who are forced to exit the program due to the following extenuating circumstances are excluded:

- Incarceration or entry into a 24-hour support facility such as a hospital or treatment center
- Medical treatment that lasts more than 90 days
- Being called into active duty in the National Guard or other armed services for at least 90 days
- Death

Can students with more than one POP within a program year earn MSGs retroactively?

Yes, there are two retroactive MSGs:
- **MSG 1a**: If a student separates and returns and did not earn an MSG in the prior POP, the student may earn an MSG based on their first post-test within the new POP. If this results in an EFL gain, the gain is applied retroactively to the prior POP. That post-test will serve as the post-test to the prior POP, and the new pre-test for the new POP. The student may earn an additional pre/post-test MSG for their new POP from another EFL gain after post-testing with sufficient hours.
- **MSG 2:** If a student earns either an HSE Credential or an AHS Diploma, an MSG is applied to the student's current POP and any preceding POP within the program year.

Credential Attainment Indicator

Title II programs have always tracked the number of students obtaining a secondary credential as a follow-up outcome measure for NRS reporting. However, WIOA establishes a credential indicator that includes secondary and postsecondary credentials. This section explains the credential indicator, who is included in the measure, how it is calculated, how it differs from previous measures, and how it is reported.

What is the credential indicator?

The credential attainment indicator measures two types of credentials:

- Receipt of a secondary school diploma or recognized equivalent during participation or within one year after exit from the program. The receipt of this credential is only counted if the participant also enters postsecondary education or training, or employment within one year after exit.
- Receipt of a recognized postsecondary credential during participation or within one year after exit from the program.

Who is included in the credential indicator?

The secondary school diploma credential component of the indicator applies only to participants enrolled in a secondary education program at or above the ninth-grade level who exited the program and who did not have a secondary school diploma or its equivalent at program entry. The postsecondary education credential component of the indicator applies only to participants who were enrolled in a postsecondary education or training program who exited.

Participants in correctional education programs (WIOA Section 225) are excluded from the indicator. In addition, participants are excluded from the indicator if they are forced to exit the program due to the following extenuating circumstances:

- Incarceration or entry into a 24-hour support facility such as a hospital or treatment center
- Medical treatment that lasts more than 90 days
- Being called into active duty in the National Guard or other armed services for at least 90 days
- Death

How is the credential indicator calculated?

The credential indicator is calculated as a percentage of the total number of participants who exited during the reporting period who achieved either credential as defined above divided by the total number of participants (1) who exited and were enrolled in a postsecondary education or training program plus (2) all participants who exited and were enrolled in a secondary education program at or above the ASEL level and did not have a secondary school diploma or its equivalent.

Literacy Education Information System (LEIS)

Based on National Reporting System guidelines, every State must have an electronic management information system to collect student data. North Carolina's Literacy Education Information System (LEIS) is ADVANSYS by Benchmark, ITS. The system collects information based on Federal requirements, including student demographics, educational background, special programs, student data, Adult High School and High School Equivalency outcomes, and pre-post test results.

Every Title II provider must have a trained LEIS staff member who is knowledgeable and proficient in data entry and understands the purpose and guidelines for student data collection. Training is provided by the North Carolina Community College System Office. LEIS Forms

A uniform data collection form has been developed to collect the information for input into the management information system. This instrument is referred to as the Literacy Education Information System (LEIS) form. All NC Title II programs are required to use the System Office's standardized LEIS form to collect and record student data. Additions can be made to the forms, but no changes may be made to the existing components. The form is available in both printable and electronic versions on the NCCC CCR Performance Website.

North Carolina Community College System
Literacy Education Information System (LEIS)

Provider Name	Central Piedmont Community College	ADVANSYS ID #		Colleague #	
Enrollment Date:		Program Year 2024-2025	Period of Participation	☐ 1st ☐ 2nd ☐ 3rd	

STUDENT BIO

1. First Name: _____ Middle Name: _____ Last Name: _____

   Preferred Name: _____ Previous Last/Maiden Name: _____

2. Date of Birth: _____ (MM/DD/YYYY) 3. Gender/Sex ☐ Female ☐ Male ☐ Non-Binary ☐ No Answer

4. Mailing Address _____ Address Line 2 _____

   City _____ State _____ Zip Code _____ County _____

5. Primary Contact Phone: _____ Emergency Phone: _____

   Cell Phone: _____ Work Phone: _____

6. Email: _____

7. Social Security Number/EIN _____

8. Ethnicity (Select One) ☐ Hispanic/Latino ☐ Non-Hispanic/Non-Latino

11. Race ☐ American Indian or Alaskan Native ☐ Asian ☑ Black or African American ☐ Native Hawaiian or Other Pacific Islander ☐ White ☐ More than One Race

PROGRAM TYPE

Enrollment Date: _____

12. Program Type: Check All that Apply
   - ☐ Adult High School Student (AHS)
   - ☐ Integrated English Literacy & Civics Education (IELCE)
   - ☑ NRS Registration *(a student must have an NRS Registration)
   - ☐ Integrated Education and Training Program (IET)
   - ☐ Multiple Pathways to High School Equivalency (MPHSE)
   - ☐ Work-Based Learning Program
   - ☐ Co-Enrollment in College Program

13. Registration Date _____ (MM/DD/YYYY)

14. Last Secondary/Elementary School attended _____

15. Last Date Attended? (mm/yy) _____ 16. Country of Last School Attended _____

17. Educational Level at entry (check one)
   - ☐ No Schooling
   - ☐ No diploma (Enter 1-11 for last grade completed)
   - ☐ High School Graduate/Grade 12 Completed
   - ☐ High School Equivalency (GED or HiSet)
   - ☐ Adult High School Graduate
   - ☐ Unknown
   - ☐ Certificate of attendance/completion as a result of completing an IEP
   - ☐ Some Postsecondary education, no degree
   - ☐ Post high school vocational diploma
   - ☐ Associate Degree
   - ☐ Bachelor degree
   - ☐ Master degree or higher

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Providers are responsible for ensuring all state and federal data are collected for each student in the program. Each provider has the option to either use a paper-based or digital Literacy Education Information System (LEIS) form and enter student data at least once per week into ADVANSYS, or to enter data directly into the ContinuED feature in ADVANSYS, which will serve as the student's electronic LEIS form. Providers must also ensure that all relevant data are entered and approved in ADVANSYS within one week of initial entry in order to facilitate accurate reporting of all data in federal and state outcomes. Regular monitoring and evaluation of progress on federal measures is required to ensure continual program improvement.

Providers are required to submit data electronically using ADVANSYS. All data, including demographics, attendance, and assessments, must be entered at least once per week and approved within a week of entry. All Title II-funded programs are required to complete the following actions into ADVANSYS on a weekly basis:
   1. Enter and Approve Student Registrations
   2. Update and Approve Student Demographic Profiles (*as needed*)
   3. Enter and Approve Student Test Scores
   4. Enter and Approve Student Attendance
   5. Enter and Approve Student Outcomes

Data must be collected for all eligible students receiving services provided by Title II AEFLA funds. This includes individuals in either the Reportable or Participant classification.

Performance Reports

Title II, the Adult Education and Family Literacy Act (AEFLA) requires states to collect and report data on adult education student outcomes to the National Reporting System (NRS). Title II providers are required to enter data within a week of receipt and to approve the data in ADVANSYS within a week of entry to the system. Benchmark sends a flat file to the state monthly to be used for monitoring and reporting periods. Once tabulated, each provider's data is displayed on Power BI Dashboards for provider review. Access to the Title II Power BI dashboards is granted locally by a college's designated Data Coordinator or granted by the state office for community-based organizations.

For the 2024-25 program year, the North Carolina AEFLA negotiated level of federal performance was a state-wide measurable skill gain (MSG) rate of 43.6%. In North Carolina, annual baseline levels of success for providers are set at 80% of the state's goal (33.6%). Excellence levels are set at the state goal plus half of the distance between the baseline and state goal (46.2%). Federal performance rates are negotiated annually.

Community College provider MSG rates are evaluated for both federal and state performance. State performance baseline and excellence levels differ from federal performance baseline and excellence levels and are reset annually based on the System (58 college) mean.

Records Retention

Title II providers must retain all local program records and supporting documents for a minimum of five years from the date of submission of the final expenditure report. All State and local Adult High School transcripts and diplomas must be maintained indefinitely at the local level.

> **Additional guidance on records retention can be obtained from the**
> **Records Retention and Disposition Schedule.**

PERSONNEL

CREATING SUCCESS

PERSONNEL

Major Points
1. In North Carolina, Title II funded providers agree to employ well-trained instructors, counselors, and administrators who meet any minimum qualifications established by the State, where applicable, and who have access to high quality professional development, including through electronic means.
2. It is recommended that instructors have a credential/certification in either K-12, Special Education, Adult Education, TESOL, or another recognized credential. Volunteer tutors are not subject to credentialing requirement.
3. NCCCS has developed a variety of Adult Education credentialing options for Title II instructors.
4. Title II funds may be used to hire instructional-related staff such as teachers, coordinators, lab facilitators, assessment and retention specialists, advisors, and counselors.
5. Up to 5% of the Federal portion of the Title II grant may be used for support of administrative functions (such as staff-related administrative duties, clerical, infrastructure costs for NC Works, etc.) In cases where the 5% limitation is too restrictive to allow for adequate planning, administration, personnel development, and interagency coordination, the program may request that the System Office review its situation ~~in order to~~to determine an adequate level of funds to be used for non-instructional purposes.
6. Title II providers must maintain personnel data needed for Federal reporting.

Teaching Certification

Research studies prove that the quality of instruction has the greatest impact on student performance. In North Carolina, Title II funded providers should employ staff who hold NRS credentials. Instructors, faculty, or staff are classified credentialed if they have one of the following:

- **K-12:** A credential awarded by an educational institution for undergraduate or graduate studies that focuses on teaching.
- **Special Education:** A credential awarded by an educational institution for undergraduate or graduate studies that focus on teaching children or adults with disabilities or special needs.
- **TESOL:** Teachers of English to Speakers of Other Languages certification.
- **Adult Education:** A credential or degree awarded by an educational institution for undergraduate studies that focuses on teaching adult education students.
- **Graduate Degree:** Awarded by an educational institution for studies that focuses on teaching, school administration, or a specific content area that aligns to one of the NC Adult Education Content Standards. For example: math, technology, or reading.

A K-12 teaching credential that is expired also counts as a credential. Volunteer tutors are not subject to the credentialing requirement.

An Adult Education credential may be demonstrated in several ways. Below are a few:

1. NCCCS Core Credential
2. NCCCS Fundamentals of Teaching Adult Learners Part I & Part II Credential
3. NCCCS ASE Language Arts Credential
4. NCCCS ASE Math Credential
5. NCCCS Fundamentals of Teaching ESL Part I & II Credential
6. NCCCS Standards-In-Action Credential in Standards-Based Instruction
7. NCCCS STAR Credential
8. NCCCS Evidence Based Reading Instruction Credential
9. ASU Certified Resource Specialist in Adult Education
10. Bachelor's degree in education with a concentration in an adult education related subject area
11. Master's degree or doctoral degree in education with a concentration in one of the Adult Education Content Standards or an adult education related subject area
12. Certification from an accredited educational institution in an instructional area.

Allowable Costs for TITLE II Personnel

Title II funds may be used to hire instructional-related staff such as teachers, coordinators, lab facilitators, assessment and retention specialists, advisors, and counselors.

Up to 5% of the Federal portion of the Title II grant may be used for support of administrative functions (such as staff-related administrative duties, clerical, etc.) In cases where the 5% limitation is too restrictive to allow for adequate planning, administration, personnel development, and interagency coordination, the college may request that the System Office review its situation to determine an adequate level of funds to be used for non-instructional purposes. (It should be noted that 1.5% of the 5% administration cap is removed prior to the grant award; that leaves 3.5% for use on other administrative functions.)

Payment for non-Teaching Hours

Part-time instructors may be paid for non-teaching duties such as attending meetings or professional development if those duties and designated times for performing them are identified in their contracts. The duties listed should be specific, such as meeting with employers or curriculum development.

NRS Reporting of TITLE II Personnel

Title II providers must maintain personnel data needed for Federal reporting on Table 7. This includes data on the number of full-time and part-time administrative positions, counselors/advisors, paraprofessionals, teachers as well as unpaid volunteers. Additional information is required for teachers including the number of years of experience in adult education and the nature of their teaching certification. Personnel data should be entered in ADVANSYS in the User Management section. A user account should be created for all Title II personnel. When a teacher or staff member is no longer employed with the program, the user account should be made inactive in ADVANSYS.

PROFESSIONAL DEVELOPMENT
CREATING SUCCESS

PROFESSIONAL DEVELOPMENT

Major Points
1. **The national Literacy Information and Communication System (LINCS) (https://lincs.ed.gov/) offers a variety of professional development resources including searchable resources, Community of Practice, and self-paced online courses.** 2. ***The Fundamentals of Teaching Adult Learners Certificate Part I & Part II:*** **These credentials are delivered through an instructor-facilitated online learning cohort model in the NC Title II Moodle Portal and prepares participants to provide quality adult education in College & Career Readiness programs. It is made up of units which train participants in research and evidence-based methodologies as well as learning philosophies to teach adult learners.** 3. ***The Fundamentals of Teaching ESL Certificate Part I & Part II:*** **These credentials are delivered through an instructor-facilitated online learning cohort model in the NC Title II Moodle Portal and prepares participants to provide quality adult English as a second language instruction in College & Career Readiness programs. It is made up of units which train participants in research and evidence-based methodologies as well as learning philosophies to teach adult second language learners.** 3. ***Adult Secondary Education Specialty Certificates:*** **These credentials are available through an instructor-facilitated online learning cohort model in the NC Title II Moodle Portal and are designed instructors working with students at the adult secondary education level (NRS Levels 5 and 6). They include ASE Language Arts and ASE Math.** 4. **Every Title II provider must designate funding for professional development activities in its annual budget.**

Professional Development Budget Requirements

Every Title II provider must designate funding for professional development activities in its annual budget, identify a team member as the local Professional Development Facilitator, and create an annual professional development plan. The funds designated for professional development should be tracked to verify expenditures. Professional Development expenditures may include expenses such as travel to local, State and/or national conferences, workshops, and institutes; stipends for part-time staff to attend workshops; training development; and materials costs. Additional PD trainings are also available for other key personnel.

Professional Development System

The North Carolina Community College System Office provides a variety of professional development opportunities for Title II providers throughout the year. In addition to regular informational and instructional best practices webinars as well as the monthly New Directors' Orientation for local directors, NCCCS offers a variety of on-demand, hybrid, and instructor-facilitated credentialing courses hosted on the NCCCS NC Title II Moodle Portal. The NCCCS also offers multiple regional in-person professional development days throughout the program year designed to showcase innovative instructional strategies from North Carolina Title II providers.

LINCS: A National Professional Development Resource

The Literacy Information and Communication System (LINCS) offers a variety of professional development resources including searchable resources, Community of Practice, and self-paced online courses.

- LINCS provides free online access to high-quality, evidence-based, vetted materials to help adult education practitioners and state and local staff improve programs, services, instruction, and instructional quality. Spanning 15 topic areas, the collection provides relevant instructional resources and professional development materials, as well as research articles, policy briefs, reports, multimedia resources, and more. Information on how to use the featured resources to enhance teaching and learning also is available, as well as limited technical assistance via support@lincs.ed.gov.

- The LINCS Community is an interactive online social learning space (a community of practice) for conversation, networking, and professional development, which works in tandem with the LINCS Resource Collection and the LINCS Professional Development Center to improve evidence-based practice in adult education. The community, supported by leaders in the field, facilitates increased knowledge sharing and collaboration among adult education leadership, professional developers, administrative staff, and practitioners across the country. Community groups are based on the topic areas in the LINCS Resource Collection.

- LINCS offers self-paced online courses for adult education practitioners. These courses are available for use anytime, anywhere on the LINCS Learning Portal.

  - Career Pathways
  - Disabilities and Equitable Outcomes
  - English Language Acquisition
  - Integrating Technology
  - Teaching Adults to Read

  - Content Standards
  - Technology
  - Differentiated Instruction
  - Research in the Classroom
  - Teacher Effectiveness

College & Career Readiness Credentialing Courses

In 2012, the North Carolina CCR Professional Development Team established a credentialing system to train instructors in evidence-based teaching methodologies. These include the learning philosophies and frameworks that are unique to adult education and literacy activities. The credentialing courses and credentialing process funded through the NC Community College System are accessible to all full or part-time Title II instructors or community-based volunteers. The credentials provided via NCCCS can be obtained through an online delivery format. These credentials are awarded through the NC Title II Moodle Portal.

1. **Fundamentals of Teaching Adult Learners Part I Credential**
2. **Fundamentals of Teaching Adult Learners Part II Credential**
3. **Fundamentals of Teaching ESL Part I Credential**
4. **Adult Secondary Education (ASE) Math Credential**
5. **Adult Secondary Education (ASE) Language Arts Credential**

Local Professional Development Planning

At the core of any strong Title II program is a commitment on the part of all employees to continually expand their knowledge and skills. Each provider should have a local professional development plan in place that outlines the anticipated activities for the year. The plan should be based on program and

individual professional development plans, program improvement needs, current research, and evidence-based practice. Examples of staff development activities may include single- or multi-session face-to-face or distance learning trainings, peer coaching, study circles, teacher research, and visits to other adult literacy programs.

Required Trainings

Various staff functions under Title II may involve required professional development that is offered or facilitated through the NCCCS. Below is a list of some of those required trainings.

Annual Program Year Convocation: The annual Program Year Convocation provides opportunities for directors to learn about policy updates. Programs are required to send a representative to this essential meeting.

NRS Approved Assessment: All staff who either administer or score any standardized assessment used to measure educational gain must be trained before administering the tests. All personnel who administer any National Reporting System approved assessment must complete training by certified trainers. In addition, all staff including instructors involved in gathering, analyzing, compiling, and reporting data for the National Reporting System must be trained.

GLOSSARY OF TERMS

CREATING SUCCESS

GLOSSARY OF TERMS

Adult Basic Education - A program of academic instruction and education services below the secondary level that increase an individual's ability to read, write, and speak in English and perform mathematics necessary to attain a secondary school diploma or its recognized equivalent, transition to postsecondary education or training, and obtain employment.

Adult Secondary Education Program—A program of academic instruction and education services at the secondary level that increase an individual's ability to read, write, and perform mathematics necessary to attain a secondary school diploma or its recognized equivalent, transition to postsecondary education or training, and obtain employment.

Adult Education and Literacy Activities (defined according to WIOA): Programs, activities, and services that include adult literacy and education, English language acquisition, family literacy, integrated (full implementation of "integrated" is expected in fiscal year 2016-17) English literacy and civics education, workforce preparation, integrated education and training, and workplace education. (Workforce preparation and integrated education, including career pathways, will be a *requirement* of WIOA implementation.)

Career Pathway - the term means a combination of rigorous and high-quality education, training, and other services that –

(A) aligns with the skill needs of industries in the economy of the state or regional economy involved;

(B) prepare an individual to be successful in any of a full-range of secondary or postsecondary options, including apprenticeships;

(C) include counseling to support an individual in achieving the individual's education and career goals;

(D) includes as appropriate, education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupational cluster;

(E) organizes education, training, and other services to meet the particular needs of an individual in a manner that accelerates the educational and career advancement of the individual.

(F) enables an individual to attain a secondary diploma or its recognized equivalent, and at least one recognized postsecondary credential; and

(G) helps an individual enter or advance within a specific occupation or occupational cluster.

ADVANSYS: North Carolina's electronic data management system for Title II data collection, reporting and performance accountability for all Title II providers.

Concurrent Enrollment: Enrollment in adult education and credit-bearing academic postsecondary education.

Community Corrections Programs—A community-based rehabilitation facility or halfway house.

Correctional Education Program—A program of ABE, ASE, or ELL instruction for adult criminal offenders in correctional institutions.

Distance Education—Formal learning activity where students and instructors are separated by geography, time, or both for the majority of the instructional period. Distance learning materials are delivered through a variety of media, including but not limited to, print, audio recording, videotape, broadcasts, computer software, Web-based programs, and other online technology. Teachers support distance learners through communication by mail, telephone, e-mail, or online technologies and software.

Educational Functioning Level (EFL) - There are four levels for adult basic education (ABE), two for adult secondary education (ASE), and six levels for English as a second language (ESL). Each level is comprised of a set of skills and competencies that participants at that level can do in the areas of reading, writing, numeracy, speaking, listening, and functional and workplace areas. Using these descriptors as guidelines, programs determine the appropriate initial level at which to place participants using a standardized assessment approved in the State assessment policy for use in National Reporting System (NRS). The program decides the skill areas in which to assess the participant based on the participant's instructional needs and program requirements.

ESL/English Language Acquisition Program—A program of instruction designed to help eligible individuals who are English language learners (ELLs) to achieve competence in reading, writing, speaking, and comprehension of the English language, and that leads to attainment of a secondary school diploma or its recognized equivalent and transition to postsecondary education and training or employment.

English Language Learner (*defined according to WIOA*): An eligible student who has limited ability in reading, writing, speaking, or comprehending the English language, and whose native language is a language other than English or who lives in a family or community environment where a language other than English is the dominant language.

Family Literacy Program—A program with a literacy component for parents and children or other intergenerational literacy components.

Integrated Education and Training (IET)—A service approach that provides adult education and literacy activities concurrently and contextually with workforce preparation activities and workforce training for a specific occupation or occupational cluster for the purpose of educational and career advancement.

Integrated English Literacy and Civics Education—A program of instruction funded under WIOA, Section 243, which includes education services provided to English language learners who are adults, including professionals with degrees and credentials in their native countries, that enables such adults to achieve competency in the English language and acquire the basic and more advanced skills needed to function effectively as parents, workers, and citizens in the United States. It includes instruction in literacy and English language acquisition and instruction on the rights and responsibilities of citizenship and civic participation and may include workforce training. In addition, the program must be provided in combination with IET.

Literacy Education Information System (LEIS) – North Carolina's management information system used to collect student data. The LEIS form is North Carolina's Title II data collection tool.

Other Institutional Programs—Any other medical or special institution.

Participant – an individual in an adult education program who has completed at least 12 contact hours in a period of participation and has a valid entering educational functioning level (EFL).

Postsecondary Educational Institution (defined according to WIOA) **-** An institution of higher education that provides not less than a two-year program of instruction that is acceptable for credit toward a bachelor's degree, a tribally-controlled college or university, or a nonprofit educational institution offering certificate or apprenticeship programs at the postsecondary education level.

Reportable (as defined by WIOA): an individual who registers with an Adult Education Program or provides identifying information, takes action that demonstrates an intent to use program services, but has less than 12 contact hours. These individuals are reported on Table 2A only.

Workforce Preparation: Activities, programs, or services designed to help an individual acquire a combination of academic, critical thinking, digital literacy, and self- management skills, including competencies in utilizing resources and information, working with others, understanding systems, and obtaining skills necessary for successful transition into (and completion of) postsecondary education and training, or employment.

Workplace Literacy—Activities offered by an eligible provider in collaboration with an employer or employee organization at a workplace or an off-site location that is designed to improve the productivity of the workforce.