

# LOUISIANA COMMUNITY & TECHNICAL COLLEGE SYSTEM

## Policy # 1.102

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### **Title: WorkReady U – Program Administration**

Authority: Board Action

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### **State Oversight**

The Adult Education and High School Equivalency Testing Program shall be administered by the Louisiana Community and Technical College System (LCTCS) and operated by eligible entities as stipulated in the authorizing federal legislation. The LCTCS shall certify adult education sites of instruction using procedures as approved by the Board of Supervisors of the Louisiana Community and Technical College System (LCTCS).

Louisiana state law established adult education under the jurisdiction of the LCTCS, and LCTCS serves as the administrative entity for Title II, Adult Education (Louisiana Revised Statute 17:2317.1D, Acts 132 & 732 of the 2010 Regular Session) for the purpose of establishing and maintaining adult education programs to conduct adult education classes. Adult Education Services is the unit within LCTCS responsible for the administration and oversight of Louisiana's statewide adult education system.

### **Student Eligibility Requirements**

- A. Students must be 18 years of age or older to enroll in an adult education program.
- B. Based upon mandatory attendance laws and the Louisiana Department of Education, Board of Elementary and Secondary Education (BESE) policy, the parent, tutor, or other person responsible for the school attendance of a child who is under the age of 18 and who is enrolled in a public school or homeschool beyond his sixteenth birthday may request a waiver from the local superintendent for the child to exit school to enroll and attend an adult education program approved by the Board of Supervisors of the Louisiana Community and Technical College System (LCTCS).
  1. In the case of a child with no parent, tutor, or other person responsible for his school attendance, the local school superintendent may act on behalf of the student in making such a request if one or more of the following hardships exist and if the following appropriate documentation is on file at the local school board office:
    - a. pregnant or actively parenting;
    - b. incarcerated or adjudicated;
    - c. institutionalized or living in a residential facility;
    - d. chronic physical or mental illness;

- e. family and/or economic hardships.
    - i. Family and/or economic hardship is defined as a student who acts as a caregiver or must work to support the family due to a parent's death or illness or needs to be removed from an existing home environment.
2. The local school superintendent or his/her designee may approve the request without requesting action from the Louisiana Department of Education, Board of Elementary and Secondary Education (BESE). If the request to exit school to enroll in a LCTCS-approved adult education program is denied at the local level, a student may request the waiver from the Louisiana Department of Education, Board of Elementary and Secondary Education (BESE), with documentation of reason for denial at the local level. Students seeking to exit school to enroll in adult education, who are enrolled in a formal education setting other than a public K-12 institution or homeschool, may request a waiver from the school/institution they attend.

### Eligible Providers

In adherence to WIOA, organizations with demonstrated effectiveness in providing adult education and literacy activities may include:

- Local educational agencies;
- Community-based or faith-based organizations;
- Volunteer literacy organizations;
- Institutions of higher education;
- Public or private nonprofit agencies;
- Libraries;
- Public housing authorities;
- Nonprofit institutions that are not described above and have the ability to provide adult education and literacy activities to eligible individuals;
- Consortia or coalitions of agencies, organizations, institutions, libraries or authorities described above; and
- Partnerships between an employer and an entity described above

### Allowable Activities

The following services and activities are allowable under WIOA Title II:

- **Adult Education and Literacy:**
  - Adult Basic Education (ABE): 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 (ASE): A program of academic instruction and educational 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.

- **ESL/English Language Acquisition:** 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.
- **Workforce Preparation:** A program designed to include activities/services to individuals needing to acquire a combination of basic academic skills, critical thinking skills, digital literacy skills and self-management skills, Participation in workforce preparation activities also must be designed to lead to employability skills and the development of competencies in using resources and information, working with others, and understanding systems to successfully transition to and complete postsecondary education, training and employment. *WIOA Final Rules Subpart D, §463.34*
- **Workplace Adult Education and Literacy:** A program designed to provide service/activities 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 through the improvement of literacy skills. *WIOA Final Rules Subpart D, §463.30*
- **Integrated Education and Training (IET):** A service approach designed to provide 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. Required IET components are: 1) adult education and literacy, 2) workforce preparation activities, and 3) workforce training. Instruction is based on occupationally relevant materials for the purpose of educational and career advancement. Participation is intended for eligible individuals at all skill levels, including adults with low academic skills. *WIOA Final Rules Subpart D, §463.35 through §463.38*
- **Integrated English Literacy and Civics Education (IELCE):** A program of instruction funded under WIOA, Section 243, designed to include education services provided to English language learners who are adults, including professionals with degrees and credentials to language and acquire the basic and more advanced skills needed to function effectively as 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. *WIOA Final Rules Subpart D, §463.33*
- **Correctional Education:** A program of instruction funded under WIOA, Section 225, designed to include ABE, ASE, or ELL instruction for adult criminal offenders in correctional institutions. Section 225 funds are the only allowable Title II funds that may be used to serve individuals within a correctional institution. The term “correctional institution” as defined in WIOA means any—prison; jail; reformatory; work farm; detention center; or halfway house, community-based rehabilitation center, OR any other similar institution designed for the confinement OR rehabilitation of criminal offenders.

## **Adult Education & High School Equivalency Authority**

Revised Statute 17:3217.1 authorizes the Louisiana Community and Technical College System to: Adopt such rules and regulations as are necessary to establish, operate, and maintain a statewide program of adult education to eliminate adult illiteracy and to provide opportunities for adults to pursue a course or courses of study which upon completion will entitle them to be issued a Louisiana high school equivalency diploma.

Therefore, all entities offering Adult Education services in the state of Louisiana leading to the issuance of a high school equivalency diploma must register and receive approval from the LCTCS.

1. Those programs/providers who are funded through WIOA Title II: Adult Education and Literacy competitive process are approved to provide the services.
2. Other Programs will have to submit a request for approval to be reviewed by LCTCS to ensure quality of service.

### **Program Income**

Funds received by local providers are to be used to establish and operate programs that provide adult education and literacy services. Any money collected in the program must be accounted for as program income. Program income is defined as “gross income received by the grantee or sub-grantee directly generated by a grant supported activity or earned as a result of the grant agreement during the grant period.” Program income is governed by the terms of the agreement between the state and local sub-grantee. Program income must be accounted for in program records and used only for costs allocable under Adult Education and Family Literacy Act (AEFLA). Program income may only be used to provide local adult education and literacy services. This can include the payment of salaries and purchase of materials.

In accordance with the Education Department General Administrative Regulations (EDGAR) at 2 C.F.R. §200.307 and 3 CFR 76.534, tuition monies and/or fees collected must be used for classes, coordination, supervision, and general administration of full- and part-time adult basic education programs, including responsibilities associated with the management of the finances of these programs.

Grant recipients shall:

- Notify WRU that program income will be collected during the fiscal year (including the proposed amount to be charged to students);
- Provide an income waiver process to eligible students. Fees charged to students participating in an adult education program must be equitably administered and must not reach levels that have an adverse effect on the participation of economically disadvantaged students;
- Complete and submit the Program Income Report Form(s) to LCTCS. If program income was collected during the fiscal year, a detail of all collections and expenditures by object code must be included in the annual submission.
- Program income must be spent on allowable costs under AEFLA and in accordance with EDGAR Requirements for *Use of Program Income* (2 C.F.R. § 200.307) and State requirements;
- Retain documentation and receipts for program income expenditures; and

- Expend collected program income funds before submitting reimbursement requests for awarded fiscal year funds.

Unless prior written approval is received from LCTCS, institutions of higher education and nonprofit research institutions must add program income to the federal award. For example, a recipient receives a WRU subgrant in the amount of \$30,000. The recipient receives program income in the amount of \$5,000. The recipient may request reimbursement for \$30,000 but is in effect running a \$35,000 program and must expend the \$5,000 of program income on allowable expenditures under the grant.

*Program income must be used for the purposes and under the conditions of the WRU subgrant.*

Program income will be monitored by LCTCS. Grant recipients not using program income in the appropriate and specified manner will receive written notification from LCTCS and may be subjected to an on-site review and/or corrective actions as LCTCS determines necessary.

Grant recipients will report program income once during the grant award year for review by the state. The Program Income Report will be due at the end of the fourth quarter of the grant cycle. Certification of no program income is also due by the due date from any locality not collecting program income. Information about collecting and reporting program income will be included in all technical-assistance training related to grant reimbursements throughout the year. Program income will be monitored by LCTCS during collection times. Grant recipients not using program income in the appropriate and specified manner will receive written notification from LCTCS and may be subject to an on-site review. The Program Income Report form is available on the LCTCS website.