

Section 4. Policies on Services to Learners

4.1 Adult education *instructional services*, including adult basic education (ABE), English as a Second Language (ESL), Adult Secondary Education (ASE), GED preparation, Family Literacy, English Literacy and Civics Education, workplace preparation, and technology skills, must be accessible at no charge to all adults who qualify. Programs may not use AEFLA funds to generate revenue (tuition or fees) to provide or to offset the costs of any instructional services that are necessary and appropriate activities under this grant. However, programs may charge a reasonable fee for consumable materials (which then become the property of the individual paying the fee), childcare services, transportation services, etc.

To offset the costs of consumable instructional materials and equipment and other supportive services, local programs may establish policies concerning consistent, *reasonable* fees charged to individuals. To avoid creating any barriers to all AEFLA services, local policies concerning reasonable fees for consumables and support services must be consistently set, clearly defined, and published in advance. Programs must also have a plan in place to ensure that fees do not adversely impact the participation of economically disadvantaged adult learners.

All funds generated from fees charged to individuals served with AEFLA funds **must be reinvested exclusively in the adult education program and are not included in the AEFLA budget as local matching funds**. For example, monies derived from a consumable book fee may be used to purchase new books, computer software, or other instructional supplies. Programs must maintain records of all fees collected and report on the annual adult education budget form how the funds were reinvested into the program. Locally-generated funds should be spent in the year they are generated, with local programs making a concerted effort to spend the generated funds on the individual learners who paid the fees.

Adult education programs may use AEFLA funding (federal, state, and local matching) to serve only individuals who qualify for adult education services. An adult education program may elect to serve non-qualifying participants as a service to the sponsoring institution. However, when services are provided to non-qualifying participants, the adult education program must determine the cost per participant (or the cost per participant hour) of all participants and then determine the cost for services to non-qualifying

individual(s). **The sponsoring institution must reimburse the adult education program for the cost of serving the non-qualifying individual(s).** This reimbursement funding should not be considered and reported as local matching funds.

Programs may not use federal, state, nor local mill levy adult education funds to provide or to offset the costs of non-AEFLA activities, although the intent may be to generate funds to invest in the adult education program. Learners who are charged tuition or fees for adult education *instructional services* (see above) may not be served with federal, state, and local matching adult education funds, nor included in the count for AEFLA funding, nor entered into the LACES database.

4.2 According to the Wyoming State Plan, the Wyoming Community College Commission will award multi-year grants on a competitive basis to eligible providers within Wyoming. Grants will enable the eligible providers to develop, implement, and improve adult basic education activities, including the following categories:

- Adult basic education services, which may include workplace literacy services;
- Family literacy services; and
- English literacy programs, also known as English-as-a-second language (ESL) or English for Speakers of Other Languages (ESOL);
- English Literacy and Civics Education services, which includes English-as-a-second-language and citizenship skills, technology skills, and employment skills instruction.

Adult Basic Education (ABE) instruction uses TABE competencies as the basis for a curriculum that is delivered in real-life settings pertaining to the adult learners' roles as worker, family member, citizen and lifelong learner. Pre-employment skills and computer literacy are two examples of life skills and workforce development skills that may be offered as a part of ABE instruction.

Wyoming family literacy programs include four distinct components in line with the Even Start family literacy model: adult education, early childhood or pre-school education, parenting skills, and intergenerational activities (parents and children together). Only family literacy programs that include all four components meet the definition of providing family literacy services.

English literacy (ESL) programs offer instruction in speaking and listening, reading, and writing, in real-life settings pertaining to the adults' roles as worker, family member, citizen, and lifelong learner.

English Literacy and Civics Education includes services to adults in need of English language instruction, skills necessary to pass the U.S. Citizenship examination, technology skills, and competencies in governmental, educational and workplace systems.

Adult Secondary Education classes blend TABE competencies with GED preparation and pre-employment or employment specific subjects chosen by employers, learners or referring agencies. Computer literacy skills are offered as well as a number of other subjects to help prepare the adults for their roles as worker, family member, citizen, and lifelong learner. These may be offered only as a tool relevant to basic skills.

4.3 Program services to non-native speakers of English may be offered in native languages other than English in order to provide emergency or other vital communication, i.e. information presented during orientations.

However, the focus of instruction must be on acquisition of skills in the English language, not on native language skills. GED preparation in languages other than English is not permitted with AEFLA funds.

4.4 Programs must follow the guidelines of "Who Qualifies for Adult Education Services" when deciding on appropriate services to adult learners. Adults must be at least 16 years of age or above the mandatory age for compulsory school attendance.

Who Qualifies for Adult Education Services?

In order to qualify for adult education services, one of the following three criteria must be met. Upon enrollment in the adult education program, a qualifying individual:

I. Does not have a secondary credential;

A. Does not have a high school diploma; and

B. Has not successfully completed the GED battery of tests and will work on obtaining a *Wyoming GED Certificate*

OR

II. Does not have basic reading, writing, or math skills under 11th GLE in TABE.

A. Scores below 595 on a TABE Reading Diagnostic Test; or

B. Scores below 594 on a TABE Math Diagnostic Test; or

C. Scores below 585 on the TABE Diagnostic Language Test.

OR

III. Does not have proficiency in the English language necessary to function in the multiple adult roles of citizen, employee, and family member.

A. Scores below SPL 6 on the BEST Plus; or

B. Scores below SPL 7 on the BEST Literacy.

Only one of the criteria must be met to qualify for adult education services offered by an adult education program. However, an adult education learner with a high school diploma or a GED diploma must be working primarily in the area of the identified deficiency and, learning gains (via post-testing) will be reported in this area.

A learner enrolled in a community college course or vocational/technical school/college program, must meet one of the requirements above and may not be enrolled in a credit bearing course in the same area of study as the primary learning activities in the adult education program.

4.5 Programs may not require adults to show a Social Security card (they may be encouraged to show it). While programs are encouraged to recruit and serve qualifying adults residing and/or working within Wyoming, adults from another state, particularly those residing in communities along the state border, may participate in program services.

EXCEPTION:

While program staff may request to see visas, if an adult voluntarily discloses his/her nonimmigrant F-1 student visa status or the program is aware of or becomes aware of a learner's nonimmigrant F-1 student visa status, the program must inform the learner that he/she is not eligible to receive program services under AEFLA.

ESL students attending post-secondary institutions on an F-1 visa are in a unique situation. Before these students can obtain a student visa, the student must guarantee that they have English language skills at a level sufficient to handle the rigors of his/her area of study. The post-secondary institution becomes the student's "sponsor" and provides an additional guarantee to the U.S. Government, assuring that it will provide the support and instruction necessary for the student to be successful in his/her course of study. The cost for such classes is one of the additional expenses that justifies the "out-of-country" tuitions, which are usually quite significant.

To use adult education funding to serve these students violates the "most-in-need" mandate, since these students' needs for ESL instruction should be addressed and met by the sponsoring institution. If these needs are not being met by the sponsoring institution, the sponsoring institution is not fulfilling the contract it made with the U.S. government.

In addition to the issue of serving "most-in-need" learners, several adult education programs have noted that attendance of postsecondary students and/or family members in AEFLA-sponsored ESL classes significantly decreases the enrollment of ESL learners who are less educated and frequently of lower economic status. In other words, inclusion of postsecondary students in ESL classes discourages participation by the "hardest-to-serve/most-in-need" populations. **Therefore, post-secondary education students and their family members needing ESL services should not be served with AEFLA state, federal, or matching local funds.**

4.6 Local programs may choose to expand the scope and enhance the quality of services to adult learners by collaborating with other agencies and local business/industry partners. All participants receiving services through collaborative efforts that include any percentage of AEFLA funding (federal, state, or local match) must qualify for adult education services (see section 4.1: *Who Qualifies for Adult Education Services?*). Adults served in classes/programs funded through collaborative efforts that include any percentage of AEFLA funding must be counted as AEFLA participants and their records entered in LACES databases. All classes/programs/services that are supported with any percentage of AEFLA funding and all individuals served in these programs are included when determining the performance levels.

4.6.1 About contracting with other agencies or federal programs:
Contracts for adult education services with Department of Corrections (DOC), Department of Social and Rehabilitation Services (SRS), Department of Commerce, or One-Stop operators should be negotiated with the intent to improve support services to learners, to expand the program's hours/location of services, and/or to enhance the quality of adult education services in ways that would not be possible without a collaborative approach. Adult education programs must document how the contracted monies enhance, not supplant, adult education services. All services, all staff members, all program sites, and all participants served through collaborative partnerships that

include any percentage of AEFLA funding must be included in the determination of performance levels.

Contracts for adult education services with business/industry partners are permitted as long as AEFLA funding is used exclusively to provide allowable AEFLA services. AEFLA funding cannot be used to provide employer-specific training. Onsite workplace literacy programs that are supported with any percentage of AEFLA funding and their participants must be included in the determination of performance levels. Adult education programs may not contract with business/industry partners to provide work-place literacy programs if this collaborative effort results in a reduction of services to the general public. Adult education programs must monitor the effectiveness of their workplace literacy programs in comparison to their adult education programs that serve the general public.

All monies generated by contracts that include services provided by any percentage of AEFLA federal, state, and/or local matching funds must be reinvested exclusively in the adult education program. No portion of the local cash match may be generated from AEFLA federal, state, and/or local matching funds. (See Section 4.1.)

Any learner served through contractual services that are paid for exclusively by non-AEFLA funding cannot be included in the adult education learner count on LACES. The only exceptions to this policy are adults participating in Wyoming Family Literacy grant-funded programs that include the AEFLA-funded adult education program as a collaborative partner. Adult learners served in these programs may have their participation and outcomes reported on LACES.

Learners served in all other federally funded education programs (such as Title III programs) cannot be simultaneously served in an AEFLA-funded program, and, therefore, they cannot be included in the adult education learner count on LACES. Adult education programs must be able to clearly define and delineate the services provided by AEFLA funding, the service provider(s) supported by AEFLA funding, and the recipients of services provided by AEFLA funding.

NOTE: AEFLA federal administrative funds (not to exceed 5% of total federal allocation), state funds, and local matching funds may be used to meet an adult education program’s responsibilities as a partner in the local one-stop system. However, when determining the adult education program’s contribution to the local one-stop system, adult education’s “fair share” must be based on the *percentage of individuals who qualify for adult education services* who access the services of the one-stop center—not on the entire operating cost of the one-stop center. Wyoming Adult Education programs are encouraged to negotiate MOUs with their local workforce offices that allow the adult education programs to provide the services (core and/or intensive) that are closely aligned with adult education’s mission, such as assessing the basic skills levels and/or pre-employment skill levels of one-stop participants.

4.6.2 About assessments services provided for other agencies:

Programs are welcome to contract with outside agencies to provide assessments such as TABE or GED Practice Testing for non-participants in AEFLA funded programs. Such contracts should be fully self-sustaining with none of the costs offset by any AEFLA funding (federal, state, or local match).

Exception: See **NOTE** in Section 4.6.1.

4.6.3 About GED Practice Testing:

The Official GED Practice Tests (OPT) may be administered to any learner of any age, including currently enrolled high school students, as long as the test taker is capable of reading and taking the test. GED practice tests must be administered under standardized testing conditions by a GED testing center or authorized ABE staff. In some instances, a regional GED test examiner may agree to accept OPT scores from a federally and state funded adult education program that has a history of following standardized testing protocol. An adult education program *may* provide this assessment for the general public under a contract with a local GED testing center.

Required practice testing for GED testing is not the responsibility of AEFLA-funded programs, although AEFLA funded programs may negotiate with local GED testing centers to best meet the needs of individuals taking practice tests. When AEFLA programs provide GED practice testing for AEFLA learners, the practice testing is

considered part of the educational process, and the cost is an allowable AEFLA expense.

AEFLA funds, federal, state, and/or local adult education mill levy funding or other local funds designated as adult education funds, cannot be used to offset the cost of GED Testing for any individual and GED practice testing for non-AEFLA participants.

Many adult education programs are closely aligned with their sponsoring agencies' GED testing centers, and they may have problems defining the distinct roles of each of these separate entities. In general, one responsibility of the GED testing center is to provide (or contract for the provision of) GED practice testing to all interested parties. One responsibility of the adult education program is to provide GED practice testing for adult education participants. Therefore, it is especially important to emphasize that there are two distinct options for potential GED test takers: (1) sign up for and participate in an adult education program with the goal of studying for and successfully completing the GED Test Battery; or (2) sign up for a GED practice testing session with the goal of achieving a score sufficient to be able to take the GED Test Battery.

Local adult education programs should distinguish carefully between the two groups (adult education participants and outside GED testers) and should not compel adults who do not need adult education services to begin the program. According to the U.S. Department of Education, adults who do not need adult education services should not be enrolled in the program. It would, therefore, be inappropriate to enroll an adult who does not need the program simply to capture an outcome when the program itself does not need to provide instructional services to that person.

One possible process is to identify potential “testers only” who indicate they have no need for adult education services and allow them to take GED practice tests. Since these individuals have elected to bypass adult education services, they may be charged a fee for GED practice testing. If they pass the GED practice tests, then they should continue on to take the Official GED Test Battery. These students would not be entered into LACES.

On the other hand, if an individual does not pass the GED practice tests and is identified as needing adult education services, program staff should encourage this person to enter the adult education program, participate in the program's group orientation process, TABE testing, goal setting, and other activities that are required of all program participants. Once the individual begins the orientation process, he/she would receive services as would any other learner entering the program.